

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**ROBERT BERG,
Plaintiff**

**vs.
M&F WESTERN PRODUCTS, INC.,
Defendant**

§
§
§
§
§
§
§
§

Case No. 6:19-cv-418-JDK

**DECLARATION OF JOHN HARDIN IN SUPPORT
OF M&F WESTERN'S MOTION FOR ATTORNEYS' FEES AND COSTS**

I, John Hardin, do hereby declare, under the penalties for perjury under the laws of the United States of America, as follows:

1. I am above the age of 21, and fully competent to make this declaration.
2. All facts stated herein are within my personal knowledge and are true and correct.
3. I have been licensed to practice law in Texas since 1999. Currently, I am a Partner in the Commercial Litigation Group at Perkins Coie LLP, and I am the Commercial Litigation Lead for the Dallas office. I have been associated with Perkins Coie since September 2018. As a partner with Perkins Coie, I am familiar with its billing practices and procedures. Prior to joining Perkins Coie, I was a partner at K&L Gates LLP for several years.
4. I have spent the bulk of my 20+ years litigating a wide-variety of commercial litigation matters throughout Texas in state and federal courts, including in this district.
5. The following Perkins Coie attorneys worked on this case:
 - a. I am the lead counsel in this matter. My profile outlining my practice and experience is attached hereto as **Exhibit A**. Over the course of the litigation and

through the Court's December 29, 2020 Order on M&F Western's Motion for Partial Summary Judgment (Dkt. 41; "the Cross MSJ"), I billed a total of approximately 163 hours on a variety of tasks required to manage and defend the case as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G**.

- b. Judy Jennison, another Perkins Coie partner, who specializes in intellectual property (and previously led Microsoft's team of copyright attorneys), was co-counsel on this matter. Her profile outlining her practice and experience is attached hereto as **Exhibit B**. Over the course of the litigation and through the Court's December 29, 2020 Order on the Cross MSJ, she billed a total of approximately 68 hours on a variety of tasks required to manage and defend the case as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G**.
- c. Kirstin Larson, Counsel at Perkins Coie, who specializes in intellectual property, was also co-counsel on this matter. Her profile outlining her practice and experience is attached hereto as **Exhibit C**. Over the course of the litigation she billed approximately 624 hours on a variety of tasks required to manage and defend the case as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G**.
- d. James Vana, another Perkins Coie partner, who specializes in intellectual property, also performed work on this matter. His profile outlining his practice and experience is attached hereto as **Exhibit D**. As the client lead, he was involved in oversight of the case and billed approximately 52 hours during the litigation as reflected in the detailed invoices authenticated in Paragraph 9 and attached as

Exhibit G. M&F Western is not seeking to recover Mr. Vana's fees and has subtracted those fees in the amount of \$32,516.47 from the total fees sought.

- e. Rachel Haney, a litigation associate, also performed work on this matter. Her profile outlining her practice and experience is attached hereto as **Exhibit E.** Over the course of the litigation she billed approximately 30 hours on tasks primarily in connection with pretrial preparation work, such as jury instructions, as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G.**
- f. Jake Dini, a litigation associate, also performed work on this matter. His profile outlining his practice and experience is attached hereto as **Exhibit F.** Over the course of the litigation he billed approximately 3 hours on tasks in connection with legal research, as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G.**
- 6. Tracy Brandon was the primary paralegal on this matter. Over the course of the litigation she billed approximately 134 hours on a variety of tasks required to defend the case as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G.**
- 7. Valentina Barei is another paralegal who billed time on this matter when Ms. Brandon was on a medical leave. Over the course of the litigation she billed approximately 11 hours on a variety of tasks required to defend the case as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G.**
- 8. Additional time keepers billed time to the matter. These time keepers include research librarians and cite checking paralegals whose work was used to reduce the effective hourly rate of the attorneys discussed above. These time keepers: George Auslander (Senior Paralegal), Berkley Cobb (Discovery Attorney), Gianna Gargiulo (Library Reference

Assistant), Debra Howerton (Senior Paralegal), Rachel Hradecky (Librarian), Daniel Kimmons (Librarian), Kristin Kimura (Librarian), Mary McDermott (Senior Paralegal), Christine Moua (Librarian), Kacie Neu (Digital Services Librarian), Julie Pambianco (Senior Paralegal), Ashley Perkins (Research Services Supervisor), Gretchen Smidt (Senior Paralegal), Katy Smith (Senior Paralegal), and Jamie Walker (Librarian). In my experience, their billing rates are consistent with market rates given their level of skill and experience. In the aggregate, these time keepers billed a total of 52.10 hours during the course of the litigation for a total of \$14,247.19 in fees as reflected in the detailed invoices authenticated in Paragraph 9 and attached as **Exhibit G**.

9. **Perkins Coie Invoices.** Attached hereto are true and correct copies of Perkins Coie invoices relating to attorney fees and expenses incurred in defense of M&F Western in this matter (see **Exhibit G**). I have carefully reviewed the time entries and, based on my knowledge of this specific case, as well as my experience with this type of litigation, the tasks identified in the invoices and the time spent by the M&F Western attorneys and assistants on such tasks were reasonable and necessary. I have redacted information protected by the attorney-client privilege and/or work product doctrine from the invoices as appropriate. I have also redacted information regarding bank account numbers and details regarding client accounting numbers.
10. In addition, because Mr. Weaver, M&F Western's expert witness, withdrew from the case for personal reasons, M&F Western is not seeking to recover costs or fees associated with his work on the case. Thus, M&F Western has subtracted from the total invoices the amount of \$13,432.00, reflecting the approximate amount billed for work in preparing his Expert Report, for any additional discussions or preparation with Mr. Weaver related to his

deposition, as well as the amount billed to prepare M&F Western's Supplemental Filing Regarding Motion for Summary Judgment (Dkt. 66). A breakdown of the entries showing time that was deducted relating to work with Mr. Weaver is attached hereto as **Exhibit H**.

11. As the invoices in **Exhibit G** reflect, M&F Western was billed the amount listed in the table below in fees on a monthly basis. (As noted in the table with an asterisk, i.e., *, I have subtracted from the total fees, 1.2 hours of work of my time [\$1,008] that were erroneously billed to this matter on June 17, 2020.) With regard to costs, I have included **Exhibit I** hereto where I list the specific costs M&F Western is seeking to recover, as discussed below in Paragraph 13, these cost amount to \$373.17. The table below reflects M&F Western's attorneys' fees based on monthly invoices and sets forth a breakdown of the total costs and fees sought in the Motion. (M&F Western has not yet issued invoices for work on the instant motion and has thus approximate its fees below.)

[Table follows on next page]

M&F Western Fees				
<u>Invoice No.</u>	<u>Month of Service</u>	<u>Total Attorney Fees for Invoice</u>	<u>Minus J. Vana Fees per Invoice</u>	<u>Total Fees Sought</u>
6091424	September 2019	\$2,560.00	-\$2,560.00	\$0.00
6105028	October 2019	\$1,771.50	-\$1,664.00	\$107.50
6122166	November 2019	\$4,186.00	-\$2,240.00	\$1,946.00
6136729	December 2019	\$16,782.50	-\$5,696.00	\$11,086.50
6153081	January 2020	\$18,000.00	-\$2,536.47	\$15,463.53
6168784	February 2020	\$12,500.00	-\$607.50	\$11,892.50
6183295	March 2020	\$21,074.50	-\$135.00	\$20,939.50
6195628	April 2020	\$28,000.00	-\$2,700.00	\$25,300.00
6211069	May 2020	\$36,950.00	-\$2,227.50	\$34,722.50
6225608	June 2020	\$74,294.50	-\$1,620.00	\$72,674.50 -\$1,008.00* \$71,666.50
6250680	July 2020	\$41,114.00	-\$1,957.50	\$39,156.50
6267623	August 2020	\$46,469.00	-\$2,227.50	\$44,241.50
6282529	September 2020	\$28,263.00	-\$877.50	\$27,385.50
6288646	October 2020	\$39,201.00	-\$1,417.50	\$37,783.50
6305080	November 2020	\$98,000.00	-\$2,227.50	\$95,772.50
6324153	December 2020	\$36,225.50	-\$1,822.50	\$34,403.00
		\$505,391.50	-\$32,516.47	471,867.03
Attorneys' Fees through December 2020				\$471,867.03
Less Weaver Fees		-\$13,432.00		\$458,435.03
Plus Estimated fees for preparing Motion for Costs and Fees (January 2021-March 2021)		+\$25,000		\$483,435.03
Subtotal Attorneys' Fees Sought				\$483,435.03
Plus Select Costs		+373.17		\$483,808.20
Grand TOTAL Fees and Costs Sought				\$483,808.20

12. In addition to its fees, M&F Western seeks to recover certain costs in the amount of \$373.17. These costs are attributable to costs for production of documents as well as postal costs. M&F Western produced documents pursuant to Mandatory Disclosures in both January (MF 000001-000103) and February (MF 000104-F000584) and subsequently supplemented its production in accordance with the Civil Rules (MF 000585-001390).

M&F Western also subsequently provided hard copies of its trial exhibits to the Court and opposing counsel in compliance with the Court's Scheduling Order. A breakdown of the costs sought is set forth in **Exhibit I** hereto.

13. For ease of the Court's reference and to better demonstrate that the fees billed were reasonable to defend this case all the way through pretrial preparations, I have divided the time billed on this matter into phases as indicated below. Where there are invoices with work that falls into one or more phases (i.e, October 2020 and November 2020), I have aggregated out time from the relevant invoices as they relate to particular tasks. Thus, the time attributable to pretrial tasks in these invoices is highlighted in pink on the invoices (with the exception of December where the invoice is not highlighted because nearly all entries were related to pretrial work.) The fees allocated to each Phase generally track the monthly invoices, but for Phase IV and Phase V, fees are approximated in certain instances. However, no time was allocated to more than one Phase. This table is not meant to substitute for the breakdown in paragraph 11 where fees are listed based off of invoices. (The time billed by Mr. Vana and Mr. Weaver was not subtracted in the phases below).

FEES BROKEN DOWN BY PHASES OF THE LITIGATION			
Phase	Description and Time Frame	Overview of Illustrative Tasks	Approximate fees for all timekeepers
I.	Pleading stage through Answer to Complaint September 2019-December 2019	Evaluate claim; Answer (Dkt. 3) and December 26, 2019 letter to Berg inviting him to dismiss.	\$25,000.00
II.	Early Discovery: Mandatory Disclosures by M&F Western through Answer to Amended Complaint January 2020-May 4, 2020	Rule 26(f) Report (Dkt. 5); Mandatory Disclosures and Protective Order (Dkt. 12); M&F Western Document Productions; Emergency Motion to Postpone Mediation (Dkt. 14); Mediation submissions; Status Conference; Evaluate Amended Complaint and file Answer to Amended Complaint (Dkt. 24)	\$85,000.00

III.	Continued discovery through Buckle MSJ May 5, 2020 – July 2020	M&F Western Interrogatories and Requests for Admission (first through third set); Address Berg's discovery failures with opposing counsel; Motion to Compel Mandatory Disclosures (Dkt. 26); Motion for Partial Summary Judgment (Buckle MSJ) (Dkt. 27); Respond to Berg Discovery Requests;	\$145,000.00
IV.	Continued discovery through Cross MSJ and related Supplemental Briefing August 2020 – November 2020	Negotiations regarding deposition of Berg and scheduling of M&F Western depositions; Cross MSJ (Dkt. 41); Motion for Sanctions (Rule 11 Motion) (Dkt. 42); Response to Motion to Compel M&F Western Depositions (Dkt. 51); Motion for an Order to Show Cause (Dkt. 59); Emergency Motion for a Protective Order regarding M&F Western depositions (Dkt. 60); Defend depositions of M&F Western witnesses; Supplemental Reply in Support of Cross MSJ (Dkt. 76); Motion to Strike Plaintiff's Superseding Answers and Plaintiff's Declaration (Dkt. 77)	\$150,000.00
V.	Pretrial Tasks through filing of Jury Instructions October 2020 – December 2020 *Any time highlighted in pink on the invoices (plus all of the December invoice) is allocated to this phase.	Serve Pretrial Disclosures; Motion to Strike Plaintiff's Pretrial Disclosures (Dkt. 57); Motions in Limine (Dkt. 78); Joint Pretrial Order (Dkt.82), including proposed findings of fact and conclusions of law, voir dire, service of courtesy copy of M&F Western trial exhibits, Response in Opposition to Plaintiff's Motion to File Amended Pretrial Disclosures (Dkt. 88); Joint Proposed Jury Instructions (Dkt. 92); Response in Opposition to Plaintiff's Motions in Limine (Dkt. 94)	\$95,000.00

14. Further, as explained in the Motion for Costs and Fees, M&F Western is seeking recovery of the costs and fees incurred in defending against the Buckle Claims. M&F Western filed a Motion for Sanctions (Dkt. 42), seeking sanctions against Mr. Liebowitz in the form of an award of its fees for Mr. Liebowitz's violations of Rule 11 in continuing to pursue the Buckle Claims in the Amended Complaint. M&F Western's approximate costs and fees attributable to the defense of the Buckle Claims are broken out below and based off efforts

that were incurred after the Amended Complaint was filed and through the Court's ruling on the Buckle MSJ and the briefing of the Motion for Sanctions. These costs and fees are also included in the table above in Paragraph 13; thus, M&F Western is not seeking double recovery of the fees but has separated these fees out in the table below ("Defense of Buckle Claims") for the Court's ease of reference. M&F Western has highlighted the relevant invoices in **Exhibit G** reflecting approximate fees attributable to the defense of the Buckle Claims in blue highlight - the fees attributed to the Buckle Claims are approximated in some cases, as indicated on the invoices.

Defense of Buckle Claims	
Month	Fees
April 2020	\$11,072.00
May 2020	\$17,105.00
June 2020	\$21,504.50
July 2020	\$7,824.50
August 2020	\$1,683.50
September 2020	\$2,380.00
Total Attributed to Buckle Defense	\$61,569.50
Minus J. Vana Approximate fees on Buckle Defense	\$3,780
Total Fees Sought for Buckle Defense	\$57,789.50

15. The total attorney fees and costs sought is \$**483,808.20** as shown in the following summary:

Total Fees Sought, not including Buckle Claim	\$439,077.53
Total Attributed to Buckle Claims	\$57,789.50
Total Costs Sought	\$373.17
Minus Weaver Work	-\$13,432.00
Total Fees and Costs Sought	\$483,808.20

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 5th day of February 2021



By: _____

John R. Hardin
Texas Bar No. 24012784
JohnHardin@perkinscoie.com
PERKINS COIE LLP
500 N. Akard Street, Suite 3300
Dallas, TX 75201
Phone: 214-965-7700
Facsimile: 214-965-7799

Attorneys for M&F Western Products, Inc.

EXHIBIT A

Professional Biography



JOHN R. HARDIN | PARTNER

DALLAS
500 North Akard Street, Suite 3300
Dallas, TX 75201-3347
+1.214.965.7743
JohnHardin@perkinscoie.com

Veteran trial attorney John Hardin represents clients in a broad array of complex commercial litigation matters—from insurance recovery and other contractual disputes to product liability, real estate and other business problems—across multiple jurisdictions in administrative, arbitration and traditional court room settings. Serving as the Litigation Lead in the Dallas office, John uses his breadth of litigation experience to find unique solutions in highly regulated areas that achieve client's business goals and avoid lengthy trials when possible. When necessary, John has also helped clients resolve their disputes through trial having served as the lead lawyer on several matters that have gone to trial.

John was named by *D Magazine* as one of its "Best Lawyers in Dallas," in recognition of his representation of corporate and commercial clients, who have ranged from manufacturers and real estate property developers to transportation, automotive, energy, oil and gas, healthcare and telecommunications companies. He frequently speaks and writes on evolving litigation and insurance issues in Texas and at the national level. John also serves as chair of the Pro Bono Committee in the Dallas office and is a volunteer for the Dallas Zoo.

PROFESSIONAL RECOGNITION

- *D magazine's* "Best Lawyers," 2017 - 2018

NEWS

12.10.2018

Perkins Coie Launches New Tech Risk Report Blog

Press Releases

Perkins Coie is pleased to announce the launch of the Tech Risk Report, an online resource for updates, analysis and interpretation of insurance issues related to cyber coverage, privacy, virtual currency, bitcoin, cryptocurrency, and other emerging technologies. The blog is written for start-ups and other companies dealing with emerging issues in the technology industry.

09.11.2018

Partner John Hardin Mentioned in Multiple Publications Regarding Joining Perkins Coie

General News

John Hardin featured in multiple publications regarding him joining the firm's Insurance Recovery practice as a partner in the Dallas office.

09.10.2018

Perkins Coie Adds Experienced Insurance Recovery Lawyers in Dallas

Press Releases

Perkins Coie is pleased to announce that John Hardin has joined the firm's Insurance Recovery practice as a partner in the Dallas office. John is joined by Skyler Howton, an associate in the Insurance Recovery practice.

PUBLICATIONS

02.18.2020

Coronavirus Coverage: Policy Language that May Cover (or Exclude) Your Business Interruption Losses Caused by the Outbreak

Blogs

Tech Risk Report

As the coronavirus (COVID-19) outbreak continues to evolve, more businesses are feeling the impact.

01.28.2019

Evaluating Your Company's Coverage for Ransomware Attacks Under Its Cyber Insurance Policy

Blogs

Tech Risk Report

Selecting an appropriate cyber insurance policy can seem daunting. There are a number of different cyber events that have the possibility to impact businesses differently based on a number of factors, including the company's network design and cyber security readiness.

01.26.2018

Ransomware: Three Practical Considerations When Evaluating Cyber Extortion Insurance

Articles

Bloomberg Law

As ransomware—otherwise known as cyber extortion—continues to grow, insurance companies are drafting cybersecurity insurance policies to include extensive variations of ransomware coverage, the author writes, giving an overview of the primary points companies should consider when choosing a policy.

08.29.2017

What Policyholders Should Know About the Texas Hailstorm Bill

Articles

Risk Management

In his January 31, 2017 State of the State Address, Texas Governor Greg Abbott called hailstorm litigation "the newest form of lawsuit abuse" and stated his desire for legislation "that limits abusive hailstorm litigation."

03.17.2017

SB 10: A Threatened Setback for All Corporate Policyholders

Articles

Insurance Law360 and *Texas Law360*

PRESENTATIONS

07.09.2020

Fostering Effective Partnerships with Outside Counsel

Speaking Engagements

Association of Corporate Counsel / Webinar

08.21.2019

Pretrial: Jury Instructions, Verdict Forms, Motions in Limine, and Trial Memos/Briefs

Speaking Engagements

Perkins Coie Litigation Training Program / Dallas, TX

10.26.2017

Natural Disaster Recovery—Insurance Coverage Considerations

Speaking Engagements

Texas Society of CPAs

10.19.2017

Top 10 Myths About Cyber Security and Cyber Insurance

Speaking Engagements

Dallas CFO Roundtable / Dallas, TX

06.16.2017

Insurance Coverage for Cyber Events—A Policyholder's Perspective

Speaking Engagements

Dallas Bar Association / Dallas, TX

03.07.2017

Texas Insurance Law: What You Need To Know As In-House Counsel

Speaking Engagements

Dallas Bar Association Corporate Counsel / Dallas, TX

10.14.2014

Iron Clad Claim: Navigating Property, Business Interruption and other Business Insurance Claims

Speaking Engagements

Business Valuation, Forensic & Litigation Services Conference

AREAS OF FOCUS

PRACTICES

- Litigation
- Insurance Recovery Law
- Business Litigation
- Construction
- Real Estate & Land Use
- Real Estate Workouts

INDUSTRIES

- Cannabis Law

BAR AND COURT ADMISSIONS

- Texas

EDUCATION

- University of Memphis, Cecil C. Humphreys School of Law, J.D., *magna cum laude*, 1999
- Middle Tennessee State University, B.S., *cum laude*, 1996

EXHIBIT B

Professional Biography



JUDY JENNISON | PARTNER

SEATTLE
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
+1.206.359.3489
JJennison@perkinscoie.com

Judy Jennison is a partner in the firm's Intellectual Property group. Her practice focuses on intellectual property litigation and counseling for technology companies. Judy also spends a significant portion of her time on client relationship management and the evolution of legal practice.

Judy has particular experience in the application of copyright law to software. She was lead counsel for the successful search engine defendant in *Kelly v. Arriba Soft*, a landmark fair use case. She has participated in a number of other leading copyright cases, including *Nintendo v. Galoob*, *Adobe v. Southern Software* and *MGM v. Grokster*. Judy also focuses on trade secret litigation and counseling and is a former chair of the firm's Trade Secrets Group.

Judy has handled trademark, trade dress, false advertising and unfair competition claims and has participated in several high profile antitrust cases including *Atari Corp. v. Nintendo* and *United States v. Microsoft*.

In addition to her many years in private practice, Judy spent eight years as an in-house lawyer with Microsoft Corporation, where she led the company's Copyright and Trade Secret Group, served as associate general counsel for the Microsoft Office business and was responsible for significant aspects of the company's worldwide antitrust compliance efforts.



Focusing on the Law and Regulation of Bitcoin and Other Digital Currencies

Insight on the complex regulatory, enforcement, investment and consumer protection issues arising in the virtual currency ecosystem.

VISIT THE VIRTUAL CURRENCY REPORT

BIO IN OTHER LANGUAGES

[Simplified Chinese Bio | 中文简体](#)

PROFESSIONAL RECOGNITION

- Listed in *The Best Lawyers in America* 2019 - 2021: Litigation - Intellectual Property

PROFESSIONAL LEADERSHIP

- ChIPs, Pacific Northwest Chapter, Co-Chair
- Copyright Society of the USA, Seattle Chapter, Co-Chair
- Eastside Legal Assistance Program, Board Member and Volunteer, 2005 - present; Vice President, 2009; President, 2010 - 2011

- Seattle Intellectual Property American Inn of Court, Master, 2010 - 2018

RELATED EMPLOYMENT

- Microsoft Corporation, Redmond, WA, Senior Attorney, 2004 - 2006; 2008 - 2011, Associate General Counsel, 2006 - 2008
- Perkins Coie, Menlo Park; San Francisco, CA, Partner, 2000 - 2003; Of Counsel, 1999
- Fenwick & West, LLP, Palo Alto, CA, Associate, 1997 - 1999
- Steinhart & Falconer, LLP, San Francisco, CA, Associate, 1993 - 1997
- Mudge, Rose, Guthrie, Alexander & Ferdon, LLP, New York, NY, Associate, 1991 - 1993

EXPERIENCE

KELLY, ET AL. V. ARRIBA SOFT CORP., ET AL.

U.S. Court of Appeals for the Ninth Circuit

Representation of defendant in litigation establishing fair use defense for thumbnails of copyrighted photographs in Internet search engine. 280 F.3d 934 (9th Cir. 2002)

MOVE, INC. V. ZILLOW, INC.

Superior Court of Washington, King County

Represented the defendant Zillow in an employment-related unfair competition / trade secrets case against its largest competitor in which the plaintiffs sought approximately \$2 billion in damages. After the Court dismissed more than \$1 billion of plaintiffs' claimed damages, found in favor of Zillow on allegations of spoliation, and granted several of the client's motions for partial summary judgment including dismissal of most of plaintiffs' tort-based claims, case settled on what was scheduled to be the first day of trial.

NEWS

10.01.2020

Perkins Coie Recognized by Microsoft as "Top Performing" Diverse Law Firm for 2020

Press Releases

Perkins Coie is honored to be recognized by Microsoft Corporation as the global technology company's top performing diverse law firm of 2020 as part of Microsoft's Law Firm Diversity Program (LFDP). The program, which was initiated by Microsoft in 2008, seeks to address and advance diversity in the legal industry.

08.20.2020

Best Lawyers® 2021 Recognizes 358 Perkins Coie Attorneys

Press Releases

Perkins Coie is proud to announce that 358 of its attorneys were recognized by *Best Lawyers® 2021*. A total of 290 attorneys were selected by their peers for inclusion in the 2021 edition of *The Best Lawyers in America®* and 68 attorneys were selected for inclusion in the inaugural edition of *Best Lawyers: Ones to Watch*.

06.26.2020

Joint Perkins Coie, Davis Wright Tremaine, and Greenberg Traurig Team Selected as Winner in Microsoft's Legal Business Design Challenge

Press Releases

Perkins Coie is pleased to announce that its innovative virtual law firm team partnership with Davis Wright Tremaine and Greenberg Traurig has been selected as one of two winners in Microsoft's Trusted Advisor Forum on Innovation, a legal business design challenge aimed at driving innovation in Microsoft's relationships with outside law firms.

06.26.2020

Perkins Coie Mentioned in The American Lawyer - Microsoft Names Winning Firms in Legal Innovation Challenge

General News

The American Lawyer

Perkins Coie was mentioned in *The American Lawyer* article, "Microsoft Names Winning Firms in Legal Innovation Challenge," regarding its spot on one of two winning teams in Microsoft's innovation accelerator, along with other firms Greenberg Traurig and Davis Wright Tremaine.

08.15.2019

Best Lawyers® 2020 Recognizes 283 Perkins Coie Attorneys

Press Releases

Perkins Coie is proud to announce that 282 of its attorneys were selected by their peers for inclusion in the 2020 edition of *The Best Lawyers in America®*.

08.20.2018

Best Lawyers® 2019 Recognizes 277 Perkins Coie Attorneys

Press Releases

Perkins Coie is proud to announce that 277 of its attorneys were selected by their peers for inclusion in the 2019 edition of *The Best Lawyers in America*®.

05.04.2018

John Devaney, James Valentine and Judy Jennison Quoted on law.com – The Law Firm Disrupted: A New Client Service Model at Perkins Coie

General News

John Devaney, James Valentine and Judy Jennison were quoted in an article appearing on law.com, the website of *The American Lawyer*, in an article, "A New Client Service Model at Perkins Coie," which discussed the firm's Client Advantage offering.

03.01.2017

Judy Jennison Quoted in The Pink Sheet - Ex-Pfizer Employee Overseeing Xeljanz Global Marketing Sued For Trade Secret Theft

General News

The Pink Sheet

Judy Jennison was quoted in "Ex-Pfizer Employee Overseeing Xeljanz Global Marketing Sued For Trade Secret Theft," an article published by *The Pink Sheet*, regarding the challenges companies face in detecting and preventing trade secret theft by departing employees.

08.05.2016

Judy Jennison and Amelia Gerlicher were featured in the Puget Sound Business Journal article - '55,000 people have seen me naked:' A story of "revenge porn and the lawyers who are trying to stop it."

General News

Puget Sound Business Journal

Perkins Coie Attorneys Judy Jennison and Amelia Gerlicher were featured in the *Puget Sound Business Journal*, '55,000 people have seen me naked:' A story of "revenge porn and the lawyers who are trying to stop it." The article featured their pro bono work with victims whom have had their nude photos appear online without their consent.

06.17.2016

Perkins Coie Attorneys' 35-page complaint featured in The Hollywood Reporter - Video Game Streamer Twitch Sues Over Bots Artificially Inflating Broadcasters' Popularity

General News

The Hollywood Reporter

Joseph Cutler, Judith Jennison, Andrew Klein and Sunita Bali's complaint were featured in *The Hollywood Reporter* article, "Video Game Streamer Twitch Sues Over Bots Artificially Inflating Broadcasters' Popularity," regarding the use of bot services to falsely boost statistics. To read the full article, [click here](#).

06.16.2016

Judy Jennison Quoted in Law360 - Attys React To High Court's Copyright Attys' Fees Ruling

General News

Law360

Judy Jennison was quoted in a *Law360* article, "Attys React To High Court's Copyright Attys' Fees Ruling," regarding the ruling from the The U.S. Supreme Court on the *Kirtsaeng v. John Wiley & Sons* case.

12.16.2013

Perkins Coie Launches The Virtual Currency Report

Press Releases

Perkins Coie is proud to announce the launch of The Virtual Currency Report, a new blog focused on the law and regulation of Bitcoin and other digital currencies.

01.23.2013

Perkins Coie Files Petition On Behalf Of LGBT Video Game Players To Cancel "Gaymer" Trademark

Press Releases

Perkins Coie, along with co-counsel Electronic Frontier Foundation (EFF), are representing a group of gaymers (individuals who self-identify with the lesbian, gay, bisexual, and transgendered community who have an active interest in video games) *pro bono* in a petition filed with the Trademark Office to cancel the "Gaymer" trademark registration.

01.18.2012

Perkins Coie Adds Three in Seattle

Press Releases

Perkins Coie is pleased to announce that Judy Jennison, Michael Scoville and Karl Klassen have joined the firm in Seattle.

PUBLICATIONS

12.17.2018

Beyond the Billable Hour: It's Not About Economics—It's About Relationships

Articles

Corporate Counsel

Since Microsoft announced shifting away from the billable hour of its outside counsel arrangements, it has seen, not only, an economic impact, but it's seen a profound impact on the relationships between Microsoft's in-house personnel and outside counsel. Today, Microsoft's Commercial Legal Group works almost exclusively with Perkins Coie and, together, they have reshaped the client-firm relationship. [Click here to read the full article.](#)

08.02.2018

Business of Law Podcast with Judy Jennison and David Daggett

An in-depth discussion on success stories of relationship partners for institutional clients like Microsoft. This podcast covers how to build a relationship-centric culture in [part one](#) and how to support innovation and align with clients' values in [part two](#).

05.15.2018

Joy On Both Sides of the Table with Judy Jennison of Perkins Coie

Podcast

Perkins Coie Partner Judy Jennison understands the path to success requires an understanding of the client's culture and the goals of their legal department for the next several years. [Listen here on LeftFoot.](#)

03.02.2017

Perkins Coie Recognized in Law360 Article - Amazon Unit Twitch Gets A Win In IP War Against Bots

Articles

Law360

Perkins Coie attorneys Judy Jennison, Joseph Cutler, Holly Simpkins and Andrew Klein were mentioned in the *Law360* article, "Amazon Unit Twitch Gets A Win In IP War Against Bots" as counsel to Twitch in their current Intellectual Property case.

05.02.2016

New Defend Trade Secrets Act Creates Powerful Protection Options

Updates

The United States House of Representatives passed the Defend Trade Secrets Act, S. 1890 on April 27, 2016, in identical form to that previously passed by the Senate on April 4, 2016.

PRESENTATIONS

Biometrics Webinars

Understanding the Legal Implications of Artificial Intelligence Series

Webinars

For all of its benefits, AI also poses a wide range of legal and ethical risks. Our interdisciplinary team of AI, Machine Learning and Robotics practice attorneys discussed these issues in a series of webinars that will help you understand the business benefits and regulatory risks associated with enterprise AI integration and deployment.

01.23.2019

The Legal Intersection of Diversity and Technology

Speaking Engagements

Perkins Coie Partners Judy Jennison and Dominique Shelton Leipzig joined Neal Suggs, Vice President and Deputy General Counsel at Microsoft, to provide one of the first programs in a new video-based Continuing Legal Education (CLE) platform by [In-House Focus](#). The one-hour [program](#) encompasses diversity and inclusion, business ethics, privacy and cybersecurity, and technology.

08.22.2016

Trade Secret Issues of Interest 2016

Speaking Engagements

Seattle, WA

BLOG

Updated 12.2020: Digital Asset SEC Timeline

Perkins Coie LLP is pleased to bring you this updated Digital Asset SEC Timeline. The Digital Asset SEC Timeline serves as an interactive compilation of select SEC guidance, enforcement actions, and speeches relating to the application of the federal securities laws to digital assets. Beginning with the release of the DAO Investigative Report in July 2017,... [Continue Reading...](#)

Blockchain Week in Review: Week of December 18, 2020

Weekly Focus: CFTC Releases Digital Asset Primer Coinbase Submits Form S-1 to the Securities and Exchange Commission
CME Announces Ethereum Futures Product Launch in February 2021 Paxos Conducts \$142 Million Series C Raise FinCEN Issues
Notice of Proposed Rulemaking with New Recordkeeping and Reporting Requirements for Digital Asset Transactions Figure Applies
for OCC Charter Compound... [Continue Reading...](#)

LabCFTC Releases Digital Assets Primer

The Commodity Futures Trading Commission (CFTC) recently released a Digital Assets Primer that provides updated information to the public about emerging concepts in digital assets. The primer is part of a series issued by the CFTC's innovation office, LabCFTC, and is the second to delve into issues surrounding digital assets. The Digital Assets Primer is... [Continue Reading...](#)

Blockchain Week in Review: Week of December 11, 2020

Weekly Focus: Members of Congress Request SEC Clarity On Digital Securities Custody Digital Asset 'Stacks' Plans 2.0 Launch
as Non-Security Secretary Mnuchin Emphasizes G7 Coordination on Digital Currencies CFTC and SEC Leaders to Step Down DOJ
Indicts ICO Promoter for Tax Fraud, SEC Files Civil Suit France Strengthens Anti-Money Laundering (AML) Requirements for
Digital Asset... [Continue Reading...](#)

AREAS OF FOCUS

PRACTICES

- Intellectual Property Law
- Litigation
- Antitrust & Unfair Competition Litigation
- Patent Litigation
- Trade Secrets
- Trademark, Copyright, Internet & Advertising

INDUSTRIES

- Interactive Entertainment
- Artificial Intelligence, Machine Learning & Robotics

BAR AND COURT ADMISSIONS

- Washington
- California
- District of Columbia
- New Jersey
- U.S. Court of Appeals for the Ninth Circuit
- U.S. District Court for the Northern District of California
- U.S. District Court for the Eastern District of California
- U.S. District Court for the Central District of California
- U.S. District Court for the Southern District of California
- U.S. District Court for the District of New Jersey
- U.S. District Court for the Eastern District of Texas
- U.S. District Court for the Eastern District of Washington

EDUCATION

- Rutgers School of Law, J.D., 1991, Managing Business Editor, *Rutgers Law Review*
- Smith College, A.B., Mathematics, 1986

EXHIBIT C

Professional Biography



KIRSTIN E. LARSON | COUNSEL

SEATTLE
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
+1.206.359.3328
KLarson@perkinscoie.com

Kirstin Larson counsels clients on issues relating to trademark selection, prosecution and enforcement, as well as issues relating to domain name registrations, copyrights, advertising and consumer protection. She has extensive intellectual property litigation experience representing clients in state and federal courts and before the U.S. Trademark Trial and Appeal Board in trademark, trade secret and false advertising matters. She has also represented both defendants and patent owners in cases relating to a variety of technologies, including mobile devices, hydrogen fuel cells, video game accessories and biotech.

Kirstin also maintains an active pro bono practice and has represented, among others, small business owners, non-profits, and victims of domestic violence.

RELATED EMPLOYMENT

- Kirkland & Ellis, LLP, Chicago, IL, Associate, Intellectual Property, 1999 - 2001

EXPERIENCE

CARVER V. AUDIO PRODUCTS INTERNATIONAL

U.S. District Court for the Western District of Washington

Represented defendant API in jury trial proving patent relating to audio subwoofer technology obvious.

CYBERFONE SYSTEMS, LLC V. CELLCO PARTNERSHIP, ET AL.

U.S. District Court for the District of Delaware

Represented T-Mobile USA in a large, multi-defendant case related to handset operating systems.

IA LABS CA, LLC V. NINTENDO COMPANY, LTD & NINTENDO OF AMERICA INC.

U.S. District Court for the District of Maryland

Successfully defended and obtained summary judgment of non-infringement for Nintendo in a patent infringement action brought by IA Labs related to exercise gaming technology.

NEWS

01.08.2020

Perkins Coie Announces 2020 Counsel and Senior Attorney Promotions

Press Releases

Perkins Coie is pleased to announce that 36 attorneys have been promoted to the firm's counsel position, effective January 1, 2020.

PUBLICATIONS

03.05.2019

More Reasons to Register Copyrights Early: Owners Must Register Before They Sue

Updates

The U.S. Supreme Court's decision in *Fourth Estate Public Benefit Corp. v. Wall-Street.com, LLC*, 586 U.S. ____ (2019), issued March 4, 2019, resolves a longstanding circuit split regarding whether the Copyright Act of 1976 allows a copyright owner to file an

infringement suit as soon as a copyright application has been filed or instead requires the owner to wait to initiate suit until the U.S. Copyright Office has acted on the application.

AREAS OF FOCUS

PRACTICES

- Trademark, Copyright, Internet & Advertising
- Intellectual Property Law
- Patent Litigation
- Litigation

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- The University of Chicago Law School, J.D., with honors, 1999
- Harvard University, A.B., Literature, *magna cum laude*, 1993

EXHIBIT D

Professional Biography



JAMES (JIM) VANA | PARTNER

SEATTLE
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
+1.206.359.3036
JVana@perkinscoie.com

Jim Vana is a partner and immediate past-chair of the firm's Trademark, Copyright, Internet & Advertising practice, provides a full range of counseling, prosecution, portfolio management, enforcement, and dispute resolution services to clients in several different fields. Jim has developed particular skills in administrative trademark and domain name disputes, as well as copyright registration and registration of colors and other non-traditional trademarks.

Jim is active in several industry associations and has served on the editorial board of the *Trademark Reporter* and as chair of several committees for the ABA Intellectual Property Section. Jim is a regular speaker on trademark and copyright matters and has published several articles.

PROFESSIONAL RECOGNITION

- Recognized in the *World Trademark Review 1000* – The World's Leading Trademark Professionals, 2014 - 2020
 - Washington (Gold)
- Listed in *The Best Lawyers in America* 2013 - 2021: Copyright Law; Trademark Law
- Recognized as an IP Star by *Managing IP*, 2013, 2014, 2016 - 2020

PROFESSIONAL LEADERSHIP

- Washington Lawyers for the Arts Legal Clinic, Staff Attorney and Former Board Member

COMMUNITY INVOLVEMENT

- Seattle Tennis and Education Foundation, Board of Directors

RELATED EMPLOYMENT

- University of Washington School of Law, Adjunct Professor, 2007 - present
- Foley & Lardner, LLP, Milwaukee, WI, Associate and Senior Counsel, 1998 - 2004
- U.S. Patent and Trademark Office, Washington, D.C., Attorney, 1996 - 1998
- Gravel and Shea, PC, Burlington, VT, Associate, 1993 - 1996

EXPERIENCE

TRADEMARK & COPYRIGHT

CRIMINAL TRADEMARK ENFORCEMENT FOR GLASS ARTIST

Collaborated with renowned glass artist Dale Chihuly and the U.S. Attorney's Office in connections with a guilty plea and prison sentence resulting from sale of counterfeit glass artwork.

HOTEL ACQUISITION FOR FASHION DESIGNER'S HOSPITALITY BUSINESS

Represented Tommy Hilfiger Hotel Group aka The Raleigh Group in acquisition of iconic Miami hotel The Raleigh.

ADMINISTRATIVE TRADEMARK LITIGATION FOR TEMPORARY STAFFING PROVIDER

Conducted a successful opposition before Trademark Trial and Appeal Board (TTAB) for a provider of temporary services.

ADMINISTRATIVE DOMAIN NAME LITIGATION FOR MEDICAL DEVICE PROVIDER

Acquired a key Internet domain name for an international medical device company through Uniform Domain-Name Dispute-Resolution Policy (UDRP) process.

ADMINISTRATIVE TRADEMARK AND DOMAIN NAME LITIGATION FOR INTERNET COMPANIES

Represented major Internet companies in administrative trademark disputes before the Trademark Trial and Appeal Board and domain name disputes under the Uniform Domain-Name Dispute-Resolution Policy.

COPYRIGHT REGISTRATION FOR ARTIST

Advised a well-known artist regarding copyright registration strategy for sculptural works.

IP VALUATION DUE DILIGENCE FOR PLAYWRIGHT

Prepared a comprehensive review of copyright holdings of a significant playwright in connection with estate valuation.

TRADEMARK COUNSELING FOR APPAREL COMPANY

Advised multiple footwear and apparel companies on strategy for domestic and international registration of key brands, including streamlining portfolios and negotiating coexistence and acquisition agreements with third-party mark holders.

TRADEMARK COUNSELING FOR MEDICAL DEVICE PROVIDER

Advised an international medical device provider on strategy for domestic and international registration of key brands, including streamlining portfolios and negotiating coexistence agreements with third-party mark holders.

TRADEMARK ENFORCEMENT FOR APPAREL COMPANY

Coordinated a preliminary injunction lawsuit against an importer of rejected footwear products, resulting in an entry of stipulated permanent injunction and return of rejected footwear.

TRADEMARK LICENSING FOR AUTOMOTIVE CARE PRODUCTS

Negotiated a worldwide coexistence agreement for car care products manufacturer with a major international sports league, resulting in resolution of several worldwide disputes.

TRADEMARK LICENSING FOR MANUFACTURING COMPANY

Drafted licenses for an intellectual property holding company restructuring for a multi-level corporate family.

OBAMA FOR AMERICA V. DEMSTORE.COM, ET AL.

Prevailed in a contested preliminary injunction hearing and then secured a stipulated permanent injunction in a trademark infringement action relating to OFA's Rising Sun Trademarks.

NEWS

08.20.2020

Best Lawyers® 2021 Recognizes 358 Perkins Coie Attorneys

Press Releases

Perkins Coie is proud to announce that 358 of its attorneys were recognized by *Best Lawyers® 2021*. A total of 290 attorneys were selected by their peers for inclusion in the 2021 edition of *The Best Lawyers in America®* and 68 attorneys were selected for inclusion in the inaugural edition of *Best Lawyers: Ones to Watch*.

05.22.2020

Perkins Coie's Trademark Practice Ranked Tier Two Nationally by Managing IP

Press Releases

Perkins Coie is pleased to announce that its trademark prosecution practice has jumped to Tier Two in the *Managing Intellectual Property* 2020 IP Stars rankings, marking the second year in a row that the practice has climbed a spot nationally. Five Perkins Coie Trademark, Copyright, Internet & Advertising (TCIA) attorneys were also recognized: Scott Palmer (China) and Lynne Graybeal, William Rava, Grace Han Stanton, and James Vana (United States: Washington).

02.19.2020

Eleven Perkins Coie Attorneys Recognized by World Trademark Review; Firm Named a Trademark Leader across US and in China

Press Releases

Perkins Coie is pleased to announce that 11 attorneys in its Trademark, Copyright, Internet & Advertising (TCIA) practice group were recognized as leading trademark professionals in the United States and China by the World Trademark Review (WTR).

08.15.2019

Best Lawyers® 2020 Recognizes 283 Perkins Coie Attorneys

Press Releases

Perkins Coie is proud to announce that 282 of its attorneys were selected by their peers for inclusion in the 2020 edition of *The Best Lawyers in America*®.

06.18.2019

Managing Intellectual Property Recognizes 26 Perkins Coie Attorneys as IP Stars and Two as Top 250 Women in IP
Press Releases

Perkins Coie is pleased to announce that the firm and 26 of its intellectual property attorneys were recognized in *Managing Intellectual Property's (MIP)* 2019 IP Stars list. Additionally, two women partners, Shannon Bloodworth, Firmwide Co-Chair of the Intellectual Property practice, and Grace Han Stanton again landed on the *MIP* Top 250 Women in IP list.

03.04.2019

Nine Perkins Coie Attorneys Recognized by World Trademark Review; Firm Named a Trademark Leader
Press Releases

Perkins Coie is pleased to announce that nine attorneys in its Trademark, Copyright, Internet & Advertising (TCIA) practice were recognized nationally and regionally as leading trademark professionals by the *World Trademark Review (WTR)* in its 2019 WTR 1000 - The World's Leading Trademark Professionals edition.

02.14.2019

Perkins Coie Hosts Fashion and Retail Event in Milan
Press Releases

Perkins Coie, a global, Seattle-based law firm, hosted an industry event focused on future technologies for the fashion and retail industries. Held at the Starbucks Roastery and later at the Palazzo Parigi in central Milan, the event was attended by Kevin Hamilton, partner and chair of the Retail & Consumer Products industry group and emceed by Miriam Farhi, partner in Perkins Coie's Technology Transactions & Privacy Practice, with guest speaker Emanuele Bertoli, entrepreneur, innovator and CEO and founder of the BerBrand Group and its 1TrueID technology.

08.20.2018

Best Lawyers® 2019 Recognizes 277 Perkins Coie Attorneys
Press Releases

Perkins Coie is proud to announce that 277 of its attorneys were selected by their peers for inclusion in the 2019 edition of *The Best Lawyers in America*®.

08.15.2017

Best Lawyers® 2018 Recognizes 281 Perkins Coie Attorneys
Press Releases

Perkins Coie is proud to announce that 281 of its attorneys were selected by their peers for inclusion in the 2018 edition of *The Best Lawyers In America*®.

08.15.2016

Best Lawyers® 2017 Recognizes 252 Perkins Coie Attorneys
Press Releases

Perkins Coie is proud to announce that 252 of its attorneys were selected by their peers for inclusion in the 2017 edition of *The Best Lawyers In America*®, the oldest and most respected peer-review publication in the legal profession.

11.10.2015

Perkins Coie Named 2016 "Law Firm of the Year" in Trademark Law by U.S. News - Best Lawyers®
Press Releases

Perkins Coie is pleased to announce that it has been named the 2016 *U.S. News - Best Lawyers*® "Law Firm of the Year" in Trademark Law.

08.17.2015

Best Lawyers® 2016 Recognizes 245 Perkins Coie Attorneys
Press Releases

Perkins Coie is proud to announce that 245 of its attorneys were selected by their peers for inclusion in the 2016 edition of *The Best Lawyers In America*®, the oldest and most respected peer-review publication in the legal profession; a more than 10 percent increase over the 221 firm attorneys recognized by *Best Lawyers* in the 2015 edition.

08.18.2014

Best Lawyers® 2015 Recognizes 221 Perkins Coie Attorneys
Press Releases

Perkins Coie is proud to announce that 221 of its attorneys were selected by their peers for inclusion in the 2015 edition of *The Best Lawyers In America*®, the oldest and most respected peer-review publication in the legal profession.

08.21.2013

Best Lawyers 2014 Recognizes 206 Perkins Coie Attorneys

Press Releases

Perkins Coie is proud to announce that 206 of its attorneys were selected by their peers for inclusion in the 2014 edition of *The Best Lawyers In America*®.

09.12.2012

197 Perkins Coie Lawyers Recognized In 2013 Best Lawyers

Press Releases

Perkins Coie is proud to announce that 197 of its attorneys were selected by their peers for inclusion in the 2013 edition of *The Best Lawyers in America*®. Thirty-five attorneys were listed this year for the first time, representing a 22 percent increase in the number of Perkins Coie attorneys who appeared in the 2012 edition.

08.20.2012

Perkins Coie Represents Strategic Hotels & Resorts in Acquisition of Iconic Essex House Hotel

Press Releases

Perkins Coie represented Strategic Hotels & Resorts in its recent agreement to purchase New York City's Essex House Hotel from the Dubai Investment Group for a gross purchase price of approximately \$362.3 million.

PUBLICATIONS

03.27.2015

Will Supreme Court Issue Preclusion Ruling Give TTAB Decisions More Bite?

Updates

The Supreme Court addressed the preclusive effect of decisions of the USPTO's administrative court, the Trademark Trial and Appeal Board (TTAB), on district court trademark infringement proceedings in *B&B Hardware, Inc. v. Hargis Indus., Inc.* In its ruling this week, the Court held that a district court should give preclusive effect to a TTAB decision if the ordinary elements of issue preclusion are met.

01.22.2014

Trademark Applicant Ordered to Pay PTO's Attorneys' Fees in District Court Appeal

Articles

Washington Metropolitan Area Corporate Counsel Association Newsletter

05.14.2010

What Constitutes Fraud in a Trademark Application or Registration?

Articles

IPReview

PRESENTATIONS

December 2014

Trademark Year in Review

Speaking Engagements

Summer 2014

Fundamentals of Intellectual Property Law for Artists

Speaking Engagements

AREAS OF FOCUS

PRACTICES

- Trademark, Copyright, Internet & Advertising
- Intellectual Property Law
- Domain Names/Cybersquatting

INDUSTRIES

- Retail & Consumer Products
- Outdoor
- Apparel & Footwear

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- Indiana University Robert H. McKinney School of Law, J.D., 1993
- University of Michigan, A.B., English and German, 1987

LANGUAGES

- German

EXHIBIT E

Professional Biography



RACHEL HANEY | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
+1.206.359.8544
RHaney@perkinscoie.com

Rachel Haney defends companies in privacy and security litigation on a range of matters, including government investigations and data breach reporting. Her practice includes counseling companies on compliance with the Electronic Communications Privacy Act and the CyberTipline Modernization Act as well as government process. Rachel also represents clients in enforcement actions to combat platform abuse, including illegal spamming, harassment and trademark violations.

Rachel worked as a summer law clerk at the United States Attorney's Office for the Western District of Washington, where she drafted motions, trial briefs and memoranda for a wide range of criminal cases. She also externed at the King County Prosecuting Attorney's Office in the Special Assault Unit. Prior to attending Stanford Law School, Rachel was a Fulbright U.S. Student Grantee.

In her active pro bono practice, Rachel advocates for survivors of gender-based violence and human trafficking. She has drafted and argued motions for domestic violence protection orders and a motion to quash disclosure of a rape victim's mental health records, securing her clients relief from their abusers. Rachel is also active in the firm's Post-Conviction Advocacy for Survivors of Human Trafficking program, assisting survivors obtain vacatur of trafficking-related convictions. In addition, Rachel has conducted research and provided information on applicable state law for the nonprofit group Without My Consent, which aims to supply the public with tools to fight online harassment and privacy violations.

RELATED EMPLOYMENT

- King County Prosecuting Attorney's Office, Extern, 2016
- Perkins Coie, Seattle, WA, Summer Associate, 2016
- U.S. Attorney's Office, Western District of Washington, Law Clerk, 2015

AREAS OF FOCUS

PRACTICES

- Privacy & Security Law

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- Stanford Law School, J.D., 2017
- Pitzer College, B.A., History, with honors, 2011

EXHIBIT F

Professional Biography



JACOB P. DINI | ASSOCIATE

SEATTLE
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
+1.206.359.3832
JDini@perkinscoie.com

Jacob Dini focuses his practice on intellectual property matters involving trademarks, trade dress, copyrights, and trade secrets. Jacob regularly litigates trademark and copyright infringement matters in federal court, particularly in federal courts in Washington and California. He also has experience handling and managing trademark and copyright enforcement programs, including Digital Millennium Copyright Act (DMCA) takedown requests and domain name claims before the Uniform Domain-Name Dispute-Resolution Policy (UDRP) arbitration panel. Jacob often represents clients in the gaming, technology, and retail industries in their intellectual property matters. He also has experience in general commercial litigation matters, including breach of contract disputes.

Maintaining an active pro bono practice, Jacob has assisted clients with their asylum matters, advocating for clients in both state and federal court.



Trade Secret Tracker

The Latest Updates in Trade Secret Law
VISIT THE TRADE SECRET TRACKER BLOG

RELATED EMPLOYMENT

- Perkins Coie LLP, Seattle, WA, Summer Associate, 2017

NEWS

08.11.2020

Perkins Coie Launches New Trade Secret Tracker Blog

Press Releases

Perkins Coie has launched its latest blog, the Trade Secret Tracker. This legal blog will highlight and analyze the latest legal developments in trade secret litigation, including court rulings, legal news, and trade secret best practices for companies and their legal departments.

PUBLICATIONS

09.01.2020

Brand Sustainability: Practical Considerations for Creating IP Enforcement Programs

Updates

In this final issue of the Summer Sustainability Series, we address important considerations in designing and implementing an enforcement program.

AREAS OF FOCUS

PRACTICES

- Intellectual Property Law
- Trademark, Copyright, Internet & Advertising
- Trade Secrets

INDUSTRIES

- Interactive Entertainment

BAR AND COURT ADMISSIONS

- Washington

EDUCATION

- University of Washington School of Law, J.D., with high honors, Order of the Coif, Order of the Barristers, 2018, Executive Articles Editor, *Washington Law Review*
- Gonzaga University, B.S., Economics, *magna cum laude*, 2015

EXHIBIT G

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6091424	BILL DATE October 31, 2019
ACCOUNT # 064984.7008	DUE DATE November 30, 2019

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$2,560.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$0.00	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$2,560.00
--	---	----------------------------	---

Payment due in U.S. Currency

REDACTED

INVOICE #: 6091424

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 09/30/19

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
09/23/19	J. Vana	0.60	Review copyright infringement complaint;
09/24/19	J. Vana	1.30	Review copyright infringement complaint; draft correspondence to P. Eddins regarding same;
09/25/19	J. Vana	0.80	Exchange correspondence with P. Eddins regarding copyright infringement complaint; review additional information regarding buckle styles;
09/26/19	J. Vana	1.30	Review Berg copyright ownership decision; conference with P. Eddins regarding response REDACTED prepare for same;
TOTAL		HOURS 4.00	

SERVICES

\$2,560.00

PERKINScoie

INVOICE #: 6091424

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SUMMARY OF SERVICES THROUGH 09/30/19

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Vana	4.00	640.00	2,560.00
PARTNER	4.00		2,560.00
Total	4.00		\$2,560.00

TOTAL DUE THIS INVOICE \$2,560.00
--

REDACTED

1201 Third Avenue, Suite 4900
 Seattle, Washington 98101
 PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
 ACCOUNTING: 206.359.3143
 FAX: 206.359 9000

PERKINScoie

M & F Western Products
 Attn: Paul Eddins
 P O Box 208
 Sulphur Springs, TX 75483

INVOICE # 6105028	BILL DATE November 30, 2019
ACCOUNT # 064984.7008	DUE DATE December 30, 2019

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$1,771.50	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$0.00	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$1,771.50
--	---	----------------------------	---

Payment due in U.S. Currency

REDACTED

INVOICE #: 6105028

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 10/31/19

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
10/08/19	J. Vana	0.70	Review correspondence and attachments from P. Eddins regarding copyright infringement allegation;;
10/24/19	J. Vana	0.60	Review status of lawsuit; internal conferences regarding same;
10/24/19	T. Brandon	0.40	Review and document correspondence regarding service; review court docket for proof of service; review rules regarding deadline for process of same; confer with team regarding same;
10/25/19	J. Vana	0.10	Draft correspondence to P. Eddins regarding copyright infringement defense strategy;
10/25/19	T. Brandon	0.10	Review and document correspondence regarding complaint and service status;
10/29/19	J. Vana	1.20	Review evidence of third party buckle designs; analyze copyright infringement claim in light of same;
TOTAL		HOURS 3.10	

SERVICES

\$1,771.50

PERKINScoie

INVOICE #: 6105028

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SUMMARY OF SERVICES THROUGH 10/31/19

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Vana	2.60	640.00	1,664.00
PARTNER	2.60		1,664.00
T. Brandon	0.50	215.00	107.50
PARALEGAL	0.50		107.50
Total	3.10		\$1,771.50

TOTAL DUE THIS INVOICE \$1,771.50
--

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6122166	BILL DATE December 31, 2019
ACCOUNT # 064984.7008	DUE DATE January 30, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$4,186.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$0.00	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$4,186.00
--	---	----------------------------	---

Payment due in U.S. Currency

REDACTED

INVOICE #: 6122166

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 11/30/19

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
11/05/19	J. Vana	0.30	Internal conference regarding response to lawsuit;
11/05/19	T. Brandon	0.20	Review docket and report same to team; request watch notice to track docket;
11/05/19	R. Hradecky	0.40	Docket tracker for T Brandon
11/07/19	J. Vana	0.80	Review and revise response to copyright infringement allegation; conduct limited research in connection with same;
11/07/19	K. Larson	1.20	Continue drafting letter regarding non-infringement of cross and buckle designs;
11/13/19	J. Vana	0.40	Review correspondence from P. Eddins regarding strategy for responding to copyright infringement lawsuit;
11/13/19	K. Larson	0.70	Revise letter to opposing counsel regarding alleged copyright infringement;
11/19/19	K. Larson	0.10	Correspond with client regarding copyright infringement matter;
11/25/19	J. Vana	0.70	Analyze copyright infringement response;
11/25/19	K. Larson	1.80	Review materials and decision regarding alleged copyright infringement; revise response to opposing counsel regarding same;
11/26/19	J. Vana	1.30	Internal conference regarding response to copyright infringement allegation; review revised correspondence to opposing counsel regarding same;
11/26/19	K. Larson	0.80	Conference with J. Vana regarding response to letter alleging infringement by M&F designs; revise same in light of conference;
TOTAL		HOURS	
		8.70	

PERKINScoie

INVOICE #: 6122166

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES

\$4,186.00

SUMMARY OF SERVICES THROUGH 11/30/19

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Vana	3.50	640.00	2,240.00
PARTNER	3.50		2,240.00
K. Larson	4.60	385.00	1,771.00
ASSOCIATE	4.60		1,771.00
T. Brandon	0.20	215.00	43.00
PARALEGAL	0.20		43.00
R. Hradecky	0.40	330.00	132.00
INDIRECT STAFF	0.40		132.00
Total	8.70		\$4,186.00

TOTAL DUE THIS INVOICE

\$4,186.00

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6136729	BILL DATE January 31, 2020
ACCOUNT # 064984.7008	DUE DATE March 01, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$16,782.50	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$118.30	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$16,900.80
---	---	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6136729

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 12/31/19

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
12/02/19	J. Vana	0.60	Internal conference regarding copyright infringement analysis; review complaint in connection with same;
12/02/19	T. Brandon	0.30	Investigate docket for activity and report same to K. Larson;
12/02/19	K. Larson	0.30	Correspond with P. Eddins regarding copyright infringement matter; REDACTED
12/03/19	J. Vana	0.20	Review summons for lawsuit;
12/03/19	T. Brandon	0.40	Review summons and answer deadline and confer with K. Larson regarding same;
12/03/19	K. Larson	0.20	Conference regarding summons;
12/04/19	J. Vana	0.70	Internal conference regarding strategy for answer to complaint; review research regarding plaintiff's attorney;
12/04/19	T. Brandon	0.20	Review outstanding district court deadlines and submit portfolio updates to team;
12/04/19	K. Larson	1.00	Update letter to opposing counsel in light of service of Answer; conference regarding case strategy in light of same; review research regarding opposing counsel litigation tactics;
12/05/19	J. Vana	0.40	Internal conference regarding defense strategy for copyright infringement lawsuit;
12/05/19	T. Brandon	0.10	Review upcoming deadlines and confer with team regarding same;
12/06/19	K. Larson	0.10	Conference regarding case strategy;
12/09/19	J. Vana	0.80	Internal conference regarding strategy for defending copyright infringement lawsuit; analyze same;
12/09/19	K. Larson	2.30	Conference regarding case strategy; review materials regarding judge and E.D. Texas process; draft email to client regarding case strategy;
12/09/19	R. Hradecky	0.80	Court analytics for K Larson
12/10/19	J. Vana	0.60	Initial review of and revisions to letter response to copyright infringement allegation;
12/11/19	J. Vana	1.20	Review and revise correspondence to P. Eddins regarding defense strategy for copyright infringement lawsuit; review correspondence from P. Eddins with background information regarding jewelry designs;

INVOICE #: 6136729

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
12/12/19	J. Vana	0.80	Review correspondence from P. Eddins regarding defense of copyright infringement lawsuit;
12/12/19	K. Larson	0.80	Attend to correspondence from P. Eddins and begin updating letter and exhibits;
12/13/19	J. Vana	0.40	Review revised copyright infringement response letter;
12/13/19	K. Larson	1.40	Review additional information from client regarding copyright infringement claim and evidence of client's products; update letter to opposing counsel with same; conference regarding same;
12/15/19	J. Jennison	0.60	Email K. Larson and J. Vana regarding background and strategy for the litigation (.6);
12/16/19	T. Brandon	0.90	Review and document correspondence regarding answer to complaint; confer with K. Larson regarding same; research previously filed copyright answers;
12/16/19	J. Jennison	0.10	Confer regarding initial disclosure deadline and draft answer (.1);
12/16/19	K. Larson	1.80	Draft Answer to Complaint; research in connection with same;
12/17/19	J. Jennison	1.00	Review chart comparing designs (.1); prepare for client call (.1); participate in client call to discuss strategy (.8);
12/17/19	K. Larson	0.60	Continue drafting Answer; legal research regarding REDACTED
12/17/19	J. Hardin	0.80	Prepare for and attend telephone conference on strategy;
12/18/19	J. Vana	0.80	Review and revise draft answer to copyright infringement complaint;
12/18/19	T. Brandon	0.10	Review login credentials for K. Larson in the District Court of Arkansas; confer with team regarding same;
12/19/19	J. Vana	0.40	Final review of letter to opposing counsel regarding copyright infringement allegation;
12/19/19	J. Jennison	0.20	Review article regarding article on opposing counsel R. Liebowitz and email team regarding same (.2);
12/20/19	J. Vana	0.20	Review edits to letter response to copyright infringement lawsuit;
12/20/19	J. Jennison	0.30	Review draft letter to Liebowitz (.1); email J. Vana regarding format of letter (.1); email J. Hardin regarding same (.1);
12/20/19	K. Larson	0.60	Review evidence regarding client's sales of alleged infringing designs prior to 2016; update Exhibits B-C in letter to opposing counsel; conference regarding letter;

INVOICE #: 6136729

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
12/20/19	J. Hardin	0.40	Begin revising letter;
12/23/19	J. Vana	0.80	Review revised answer to copyright infringement complaint; review updated letter responding to copyright infringement allegation;
12/23/19	T. Brandon	0.10	Review Answer deadline and confer with team regarding finalizing and filing status;
12/23/19	J. Hardin	1.20	Review and revise letter to Plaintiff's attorney;
12/24/19	J. Vana	0.30	Review filed answer for copyright infringement lawsuit;
12/24/19	J. Jennison	0.40	Confer with team regarding answer and letter to Liebowitz (.2); attention to finalizing Answer (.2);
12/24/19	J. Hardin	1.40	Finalize and file Answer;
12/26/19	J. Vana	0.40	Conferences regarding letter response to copyright infringement allegation;
12/26/19	J. Jennison	0.40	Review draft letter (.2); confer with team regarding same (.2);
12/26/19	J. Hardin	0.30	Finalize and send letter to Plaintiff's counsel;
12/30/19	J. Vana	0.30	Review litigation scheduling order;
12/30/19	J. Jennison	0.20	Review email from J. Hardin regarding scheduling order (.1); email K. Larson regarding same (.1);
12/30/19	J. Hardin	0.30	Receive and review Scheduling Order and coordinate internal work session on same;
12/31/19	T. Brandon	0.30	Review and document correspondence regarding upcoming pretrial deadlines; research pro hac vice process; confer with K. Larson regarding same;
12/31/19	J. Hardin	1.00	Review Court Order on schedule and analysis of same (.6); correspondence to client on Order (.1); correspondence to internal team with additional material for Thursday's call (.3);
TOTAL		HOURS	
		29.80	



INVOICE #: 6136729

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES

\$16,782.50

FOR DISBURSEMENTS AND OTHER SERVICES THROUGH 12/31/19

DESCRIPTION	AMOUNT
Courthouse News Service - Document Delivery - 12/2019	\$0.10
Computer research - Lexis/WestLaw	\$118.20

TOTAL FOR DISBURSEMENTS AND OTHER SERVICES

\$118.30

SUMMARY OF SERVICES THROUGH 12/31/19

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	5.40	765.00	4,131.00
J. Jennison	3.20	835.00	2,672.00
J. Vana	8.90	640.00	5,696.00
PARTNER	17.50		12,499.00
K. Larson	9.10	385.00	3,503.50
ASSOCIATE	9.10		3,503.50
T. Brandon	2.40	215.00	516.00
PARALEGAL	2.40		516.00
R. Hradecky	0.80	330.00	264.00
INDIRECT STAFF	0.80		264.00
Total	29.80		\$16,782.50

TOTAL DUE THIS INVOICE
\$16,900.80

PERKINScoie

INVOICE #: 6136729

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6153081	BILL DATE February 29, 2020
ACCOUNT # 064984.7008	DUE DATE March 30, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$18,000.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$0.00	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$18,000.00
---------------------------------------	---	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6153081

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 01/31/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
01/02/20	J. Vana	0.40	Conference regarding discovery strategy;
01/02/20	J. Jennison	0.70	Review Scheduling order (.2); call with J. Hardin and J. Vana regarding scheduling and standing orders (.5);
01/02/20	J. Hardin	0.75	Prepare for and attend call related to 26(f) Scheduling Conference with J. Vana and J. Jennison
01/03/20	J. Hardin	0.30	Review deadlines under standard scheduling order
01/06/20	J. Vana	0.40	Review scheduling order;
01/06/20	J. Jennison	0.40	Review scheduling order with inserted dates (.3); email J. Hardin regarding same (.1);
01/07/20	J. Vana	0.20	Internal conference regarding scheduling order;
01/08/20	K. Larson	0.10	Conference regarding legal hold;
01/09/20	J. Vana	0.70	Internal conference regarding strategy for scheduling conference; review article regarding sanctions against opposing counsel; revise litigation hold notice;
01/09/20	J. Jennison	0.30	Review article about Richard Liebowitz (.1); circulate to team (.1); email team regarding conference with Liebowitz (.1);
01/09/20	K. Larson	1.30	Draft litigation hold notice; draft email to P. Eddins per J. Vana request regarding the same;
01/10/20	J. Jennison	0.10	Exchange emails with J. Hardin regarding correspondence with R. Liebowitz (.1);
01/10/20	J. Hardin	0.20	Correspondence to client and adversary regarding 26(f) conference;
01/12/20	J. Jennison	0.10	Respond to email from J. Hardin regarding conference (.1);
01/13/20	J. Vana	0.20	Review summary of scheduling conference;
01/13/20	T. Brandon	0.80	Review outstanding court deadlines and submit portfolio updates to team; review federal and local level rules regarding initial disclosures and discovery; confer with K. Larson regarding same;
01/13/20	J. Jennison	0.70	Respond to email from J. Hardin regarding call with opposing counsel (.1); email K. Larson regarding standard disclosures (.1); call with J. Hardin regarding conference with Liebowitz (.3); email team regarding weekly update (.1); review responses (.1);

INVOICE #: 6153081

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
01/13/20	K. Larson	3.00	Conference with PC team regarding initial disclosures and Rule 26(f) conference; review local rules; begin drafting initial disclosures;
01/13/20	J. Hardin	1.60	Coordinate 26(f) conference (.2); prepare for status conference and attend same (.8); follow up with J. Jennison (.2); prepare draft Scheduling Order and email to internal working group regarding conference (.4);
01/14/20	T. Brandon	0.60	Finalize initial disclosures; prepare case synopsis and report same to K. Larson;
01/14/20	K. Larson	1.90	Draft email to client summarizing requirements for document production and disclosures; conduct research regarding local rule requirements regarding same; update draft Initial Disclosures;
01/15/20	J. Vana	0.40	Review and revise initial disclosures; internal conference regarding same;
01/15/20	K. Larson	0.70	Update Initial Disclosures per input from Perkins team;
01/15/20	J. Hardin	0.30	Review draft initial disclosures;
01/16/20	T. Brandon	0.10	Review and document correspondence regarding discovery; confer with K. Larson regarding same;
01/17/20	K. Larson	0.20	Correspond with P. Eddins regarding Initial Disclosures and discovery; conference regarding same;
01/21/20	J. Vana	0.40	Review updated initial disclosures;
01/21/20	K. Larson	2.00	Telephone conference with P. Eddins regarding Initial Disclosures; revise same; conference regarding same;
01/22/20	T. Brandon	0.10	Confer with K. Larson regarding preparation of initial disclosures and production of documents;
01/22/20	K. Larson	0.60	Attend to document production issues and provide instructions to T. Brandon regarding same;
01/23/20	T. Brandon	1.30	Review court records for admitted parties; prepare document production; report same to K. Larson;
01/23/20	K. Larson	1.70	Update Initial Disclosures per input from P. Eddins; correspond with opposing counsel regarding Proposed Scheduling Order and Joint Status Report; telephone conference with P. Eddins regarding document production;
01/24/20	J. Vana	0.30	Review status of document production;
01/24/20	K. Larson	0.90	Correspond with opposing counsel regarding Proposed Scheduling Order and Joint Status Report; telephone conference with P. Eddins regarding document production; review documents for production;

INVOICE #: 6153081

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
01/27/20	J. Vana	0.40	Review discovery documents from P. Eddins; review draft Joint Report;
01/27/20	T. Brandon	1.00	Finalize and serve Initial Disclosures; confer with team regarding same;
01/27/20	J. Jennison	1.80	Respond to K. Larson email regarding joint report and initial disclosures (.1); review proposed changes to joint report (.3); email K. Larson and J. Hardin regarding same (.1); review initial disclosures (.1); email K. Larson and J. Hardin regarding same (.1); review correspondence regarding initial disclosures and joint report (.1); draft proposed language for joint report (.2); conversation with J. Hardin regarding same (.1); revise joint report (.2); review draft scheduling order (.1); review correspondence with opposing counsel (.1); respond to email from J. Hardin regarding status conference (.1); review more correspondence with opposing counsel (.1); review weekly update to client (.1);
01/27/20	K. Larson	1.30	Finalize Initial Disclosures for service; revise draft Status Report; conference regarding same; correspond with P. Eddins regarding same;
01/27/20	J. Hardin	1.20	Review proposed Joint Status Report (.3); review Plaintiff's proposals and comment on same, internally and with Plaintiff's counsel (.9);
01/28/20	J. Vana	0.40	Review status of discovery matters; review initial disclosures from Berg;
01/28/20	J. Jennison	0.20	Respond to J. Hardin regarding notice of appearance (.1); review notice of appearance (.1);
01/28/20	K. Larson	1.40	Review documents for production; conference regarding same;
01/28/20	J. Hardin	0.30	Review order and filings;
01/29/20	T. Brandon	2.80	Review and document correspondence regarding upcoming deadlines including document production; prepare and file pro hac vice for K. Larson and confer with K. Larson regarding same; review and finalize documents for production;
01/29/20	K. Larson	2.30	Conference with team regarding document production and discovery issues and supplementation of Initial Disclosures; prepare pro hac vice motion; review case dockets regarding prior R. Berg lawsuits;
01/30/20	J. Vana	0.70	Review document production;
01/30/20	T. Brandon	1.20	File approved pro hac vice for K. Larson; confer with K. Larson regarding same; confer with K. Larson and team regarding Notice of Disclosure and prepare same; confer with court regarding pro hac vice filed by opposing counsel;
01/30/20	K. Larson	3.30	Update Initial Disclosures per input from P. Eddins; correspond with opposing counsel regarding Proposed Scheduling Order and Joint Status Report; draft email to P. Eddins regarding case action items; conference regarding case strategy;

INVOICE #: 6153081

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
01/31/20	J. Vana	0.60	Review research regarding development of plaintiff's claimed designs;
01/31/20	T. Brandon	1.90	Review document production including scanned original files; confer with K. Larson regarding same; prepare letter regarding same and serve; REDACTED
01/31/20	J. Jennison	0.90	Review email from K. Larson regarding prior Berg litigation and respond (.3); strategize regarding next steps and respond (.2); review documents for production (.4);
01/31/20	K. Larson	4.70	Legal research regarding adding counterclaim REDACTED
01/31/20	J. Hardin	0.50	Review material K. Larson found regarding R. Berg and alleged copyrights;
01/31/20	K. Kimura	0.30	Pull copies of pleadings regarding REDACTED in two cases for K. Larson;
TOTAL		HOURS	
		50.95	

SERVICES

\$18,000.00

INVOICE #: 6153081

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SUMMARY OF SERVICES THROUGH 01/31/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	5.15	618.92	3,187.46
J. Jennison	5.20	652.08	3,390.82
J. Vana	5.10	497.35	2,536.47
PARTNER	15.45		9,114.75
K. Larson	25.40	283.67	7,205.31
ASSOCIATE	25.40		7,205.31
T. Brandon	9.80	165.78	1,624.68
PARALEGAL	9.80		1,624.68
K. Kimura	0.30	184.20	55.26
INDIRECT STAFF	0.30		55.26
Total	50.95		\$18,000.00

TOTAL DUE THIS INVOICE \$18,000.00

REDACTED

1201 Third Avenue, Suite 4900
 Seattle, Washington 98101
 PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
 ACCOUNTING: 206.359.3143
 FAX: 206.359 9000

PERKINScoie

M & F Western Products
 Attn: Paul Eddins
 P O Box 208
 Sulphur Springs, TX 75483

INVOICE # 6168784	BILL DATE March 31, 2020
ACCOUNT # 064984.7008	DUE DATE April 30, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES: \$16,122.50	DISBURSEMENTS AND OTHER SERVICES: \$477.58	LATE CHARGES:	TOTAL: \$16,600.08
WRITE DOWNS FOR SERVICES: \$(3,622.50)	WRITE DOWNS FOR DISBURSEMENTS: \$0.00	WRITE DOWNS FOR LATE CHARGES	WRITE DOWN TOTAL: \$(3,622.50)
TOTAL FOR SERVICES: \$12,500.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$477.58	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$12,977.58

Payment due in U.S. Currency

REDACTED

INVOICE #: 6168784

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 02/29/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
02/03/20	J. Vana	0.70	Conference with P. Eddins regarding discovery status and strategy; review letter to opposing counsel regarding validity of buckle copyright registration;
02/03/20	J. Jennison	0.20	Call with K. Larson regarding strategy (.2);
02/03/20	K. Larson	1.60	Telephone conference with J. Vana and P. Eddins regarding case strategy; REDACTED conference with J. Jennison regarding invalidity arguments and document production;
02/05/20	J. Jennison	1.10	Revise draft letter to Liebowitz (.2); email team regarding same (.2); respond to questions regarding document production (.3) REDACTED
02/05/20	K. Larson	0.50	Conference regarding document production and potential REDACTED REDACTED
02/06/20	T. Brandon	1.00	Confer with K. Larson regarding client original documents; finalize second production; REDACTED
02/06/20	J. Jennison	0.90	Review email from J. Hardin regarding court conference and respond (.1); confer with K. Larson regarding case strategy (.1); confer regarding hearing strategy (.5); review email from R. Liebowitz regarding court hearing (.1); email team with thoughts on script for hearing (.1);
02/06/20	K. Larson	1.90	Conference with T. Brandon regarding document production; conference with Perkins team regarding hearing strategy; correspond with opposing counsel regarding hearing; prepare outline for hearing argument;
02/06/20	J. Hardin	1.30	Review and comment on production questions and coordinate a time to discuss strategy on hearing (.7); prepare for and conference call with internal team (.6);
02/07/20	J. Jennison	0.10	Communicate with team regarding hearing (.1);
02/07/20	K. Larson	2.80	Prepare for hearing; participate in same; telephone conference with P. Eddins regarding same; conference with J. Hardin regarding case strategy; begin drafting Protective Order; research regarding Berg copyright registrations and H. Weaver registrations;
02/11/20	T. Brandon	0.30	REDACTED
02/12/20	J. Vana	0.20	Conference regarding mediation requirement;

INVOICE #: 6168784

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
02/12/20	T. Brandon	1.60	REDACTED ; review documents for production and confer with K. Larson regarding same;
02/12/20	K. Larson	2.20	Draft Supplemental Initial Disclosures; continue drafting Protective Order; conference with team regarding case strategy and mediation; conference with T. Brandon regarding document production;
02/13/20	K. Larson	0.80	Review document production; update Supplemental Initial Disclosures per information contained in document production; conference with T. Brandon regarding document production;
02/15/20	T. Brandon	2.80	Review and organize Berg's 2nd production of documents and confer with K. Larson regarding same;
02/17/20	J. Jennison	0.10	Respond to email regarding mediation strategy (.1);
02/18/20	J. Jennison	0.20	Confer with team regarding mediation (.2);
02/18/20	K. Larson	2.80	Telephone conference with P. Eddins regarding discovery and damages calculations; finalize Protective Order; conference with J. Vana regarding case strategy; prepare case budget REDACTED
02/19/20	T. Brandon	0.10	Confer with K. Larson regarding supplemental initial disclosures and production of documents;
02/19/20	K. Larson	0.60	Correspond with opposing counsel regarding Protective Order; conference with team regarding filing of same; conference with J. Hardin regarding mediation strategy and scheduling; conference with T. Brandon regarding document production; finalize Supplemental Initial Disclosures; correspond with P. Eddins regarding damages calculations and mediation;
02/20/20	T. Brandon	1.00	Finalize/serve supplemental initial disclosures and production of documents; confer with K. Larson regarding same;
02/20/20	J. Jennison	0.20	Review Order regarding mediation (.1); review email from K. Larson regarding same (.1);
02/20/20	K. Larson	0.60	Draft Joint Motion to Enter Protective Order; attend to correspondence regarding mediation date; conference with J. Hardin regarding same;
02/20/20	J. Hardin	0.20	Analysis of mediation order;
02/21/20	T. Brandon	0.20	Review mediation schedule in preparation for deadlines;
02/21/20	J. Hardin	0.40	Work session on mediation, mediation order, and upcoming document production;

INVOICE #: 6168784

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
02/24/20	T. Brandon	0.20	Confer with K. Larson on additional production of documents and prepare same;
02/24/20	J. Jennison	0.10	Review correspondence regarding mediation (.1);
02/24/20	K. Larson	2.50	Finalize draft joint motion regarding Protective Order; correspond with opposing counsel regarding same; provide instructions regarding filing of same; conference with T. Brandon regarding document production pursuant to Protective Order; review Order regarding mediation; conference with team regarding mediation and related deadlines and action items;
02/24/20	J. Hardin	0.40	Correspondence to client regarding mediation order and conference call this week (.2); telephone conference with K. Larson regarding damages (.2);
02/25/20	T. Brandon	1.10	Finalize/serve second supplemental document production; confer with K. Larson regarding same;
02/25/20	K. Larson	0.60	Review documents for production; conference with T. Brandon regarding same;
02/26/20	J. Jennison	0.10	Confer with team regarding mediation and missed deadlines (.1);
02/26/20	K. Larson	0.10	Telephone conference with J. Hardin regarding mediation and document production;
02/26/20	J. Hardin	0.30	Prepare for and attend telephone conference with P. Eddins;
02/27/20	K. Larson	1.20	Conference with J. Hardin regarding settlement offer to Berg; draft letter to R. Liebowitz regarding same and regarding mediation statement;
02/28/20	T. Brandon	0.10	Review docket and confer with K. Larson regarding same;
02/28/20	J. Jennison	0.10	Confer with team regarding mediation (.1);
02/28/20	K. Larson	3.30	Attend to correspondence regarding mediation; research in support of Emergency Motion regarding mediation; revise motion; revise letter to R. Liebowitz; various conferences with J. Hardin regarding case strategy and motion; telephone conference with P. Eddins regarding REDACTED
02/28/20	J. Hardin	0.50	Revise response to Plaintiff; prepare motion related to mediation; telephone conference with P. Eddins regarding same; correspondence with Plaintiff's counsel regarding mediation;
TOTAL		HOURS	
		37.00	

PERKINScoie

INVOICE #: 6168784

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SUBTOTAL FOR SERVICES

\$16,122.50

LESS FURTHER REDUCTION IN FEES PER CLIENT LEAD

\$(3,622.50)

SERVICES

\$12,500.00

REDACTED

SUMMARY OF SERVICES THROUGH 02/29/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	3.10	840.00	2,604.00
J. Jennison	3.10	885.00	2,743.50
J. Vana	0.90	675.00	607.50
PARTNER	7.10		5,955.00
K. Larson	21.50	385.00	8,277.50
ASSOCIATE	21.50		8,277.50
T. Brandon	8.40	225.00	1,890.00
PARALEGAL	8.40		1,890.00
Total	37.00		\$16,122.50

TOTAL DUE THIS INVOICE

\$12,977.58

PERKINScoie

INVOICE #: 6168784

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6183295	BILL DATE April 30, 2020
ACCOUNT # 064984.7008	DUE DATE May 30, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$21,074.50	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$0.00	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$21,074.50
---------------------------------------	---	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6183295

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 03/31/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
02/07/20	J. Hardin	2.40	Review filings and generally prepare for hearing today (1.0); attend conference with court (.3); work session following conference regarding next steps (.4); update J. Vanna regarding same (.3); update client regarding same (.4);
03/01/20	K. Larson	1.00	Telephone conference with P. Eddins regarding discovery and damages calculations; finalize Protective Order; conference with J. Vana regarding case strategy; prepare case budget;
03/02/20	T. Brandon	0.30	Review productions to opposing and service; confer with K. Larson regarding same;
03/02/20	J. Jennison	0.20	Review correspondence regarding mediation and conference (.2);
03/02/20	K. Larson	3.30	Revise Emergency Motion and conduct research in connection with same; conference with J. Hardin regarding same; revise letter to mediator regarding case background; conference with T. Brandon regarding document production; further conference with J. Hardin regarding document production and discovery;
03/02/20	J. Hardin	2.00	Review material and submission from R. Leibowitz; revise Motion to Postpone Mediation; correspondence to R. Leibowitz regarding status, mediation, document production, and failure of Plaintiff to appear; draft and finalize mediation statement to Magistrate Judge Love;
03/03/20	T. Brandon	0.60	Per opposing counsel's request, re-serve first production of documents; review download logs for document production and relay same to team;
03/03/20	J. Jennison	0.10	Review updated order setting status conference (.1);
03/03/20	K. Larson	3.50	Conference with J. Vana regarding case strategy; legal research regarding case law supporting imposition of sanctions against Liebowitz, REDACTED
03/03/20	J. Hardin	0.60	Confirm with Magistrate Love that mediation is canceled (.1); review Plaintiff's Response (.2); analysis of next steps (.3);
03/04/20	T. Brandon	0.30	Research initial document production and report same to J. Hardin and K. Larson in preparation for emergency hearing;
03/04/20	J. Jennison	0.20	Review K. Larson summary in preparation for hearing (.1); review correspondence with P. Eddins (.1);

INVOICE #: 6183295

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
03/04/20	K. Larson	5.20	Draft Reply in Support of Emergency Motion to Postpone Mediation; conference with J. Hardin regarding same; conference with P. Eddins regarding same; attend to finalization and filing of same; prepare for hearing regarding Emergency Motion; participate in same; further conference with J. Hardin and P. Eddins regarding strategy in light of same; draft deposition notice for R. Berg deposition; correspond with opposing counsel regarding same; research regarding Berg prior lawsuit REDACTED
03/04/20	J. Hardin	1.80	Revise Reply in Support of Emergency Motion (.3); prepare for and attend telephone conference (1.0); work session with P. Eddins afterwards on strategy (.5);
03/05/20	K. Larson	1.80	Research regarding Berg REDACTED case; correspond with P. Eddins regarding same; prepare recommendations regarding case strategy in preparation for team conference; update witness list;
03/05/20	D. Kimmons	1.00	Retrieve lower court docket and search for additional cases involving Berg REDACTED
03/06/20	J. Jennison	1.20	Call to discuss case strategy (1.2);
03/06/20	K. Larson	1.30	Participate in team conference regarding case strategy;
03/06/20	J. Hardin	1.40	Prepare for and attend internal telephone conference on strategy and next steps;
03/09/20	J. Hardin	0.50	Draft email to P. Eddins re: strategy and next steps;
03/10/20	K. Larson	0.30	Conference with J. Hardin regarding strategic recommendations for case;
03/10/20	J. Hardin	0.40	Finalize email to P. Eddins re: strategy;
03/11/20	T. Brandon	1.00	Confer with team regarding obtaining Berg copyright records;
03/11/20	J. Jennison	0.30	Confer with J. Hardin regarding strategy (.1); review email from P. Eddins regarding same (.1); confer with team regarding response to R. Liebowitz (.1);
03/11/20	K. Larson	0.70	Conference with T. Brandon regarding copyright registrations; conference regarding Berg deposition;
03/11/20	J. Hardin	0.50	Internal work session on update to P. Eddins (.2); respond to P. Eddins (.1); review email from R. Leibowitz on Plaintiff's availability and draft response (.2);
03/12/20	T. Brandon	2.70	Confer with team regarding obtaining certified copyright records;
03/12/20	J. Jennison	0.10	Email team regarding Federal Circuit hearing cancellations due to coronavirus (.1);

INVOICE #: 6183295

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
03/12/20	K. Larson	0.10	Attend to correspondence regarding deposition of Berg;
03/12/20	J. Hardin	0.20	Correspondence to client and separately to R. Liebowitz regarding Plaintiff's deposition;
03/13/20	T. Brandon	1.20	Confer with K. Larson regarding obtaining copyright records; REDACTED
03/13/20	K. Larson	0.50	Conference with T. Brandon regarding Berg copyright registrations, REDACTED REDACTED
03/17/20	T. Brandon	0.10	Confer with Copyright office regarding obtaining Berg records;
03/18/20	T. Brandon	0.60	Confer with Copyright Office regarding obtaining Berg copyright records; research/prepare requests; confer with team regarding same;
03/18/20	K. Larson	0.20	Conference with T. Brandon regarding copyright registrations;
03/18/20	J. Hardin	0.20	Correspondence regarding costs of Copyright office documents;
03/19/20	T. Brandon	0.10	Confer with Copyright office on next steps for obtaining Berg records;
03/23/20	T. Brandon	0.10	Confer with Copyright office to discuss obtaining Berg records;
03/27/20	K. Larson	0.40	Conference with J. Jennison regarding outreach from REDACTED regarding Berg lawsuit; team conference regarding discovery and potential additional defendants;
03/27/20	J. Hardin	0.40	Telephone conference with internal team regarding recent calls from recent R. Berg letters;
03/30/20	J. Jennison	0.10	Confer with team regarding Berg threats against third parties and correspondence from P. Eddins (.1);
03/30/20	K. Larson	1.20	Attend to correspondence regarding Berg lawsuits against third parties and buckle design; research regarding buckle designs pre-dating Berg's designs; conference with team regarding same;
03/30/20	J. Hardin	1.10	Telephone conference with Paul regarding REDACTED call; review material from R. Berg to other buckle manufacturers;
03/31/20	J. Vana	0.20	Analyze prior beaded buckle evidence;
TOTAL		HOURS	
		41.40	



INVOICE #: 6183295

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES**\$21,074.50****SUMMARY OF SERVICES THROUGH 03/31/20**

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	11.50	840.00	9,660.00
J. Jennison	2.20	885.00	1,947.00
J. Vana	0.20	675.00	135.00
PARTNER	13.90		11,742.00
K. Larson	19.50	385.00	7,507.50
ASSOCIATE	19.50		7,507.50
T. Brandon	7.00	225.00	1,575.00
PARALEGAL	7.00		1,575.00
D. Kimmons	1.00	250.00	250.00
INDIRECT STAFF	1.00		250.00
Total	41.40		\$21,074.50

TOTAL DUE THIS INVOICE \$21,074.50

PERKINScoie

INVOICE #: 6183295

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6195628	BILL DATE May 28, 2020
ACCOUNT # 064984.7008	DUE DATE June 27, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$28,000.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$50.50	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$28,050.50
---	--	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6195628

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 04/30/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
04/01/20	J. Vana	0.30	Review revised copyright infringement complaint;
04/01/20	K. Larson	0.20	Attend to correspondence regarding prior buckles and cross designs;
04/02/20	T. Brandon	0.40	Confer with K. Larson regarding requested copyrights and document productions; review same;
04/02/20	J. Jennison	0.30	Confer with team regarding REDACTED
04/02/20	K. Larson	2.80	Review amended complaint; research regarding REDACTED conference with J. Hardin and J. Vana regarding case strategy; draft email to opposing counsel regarding amended complaint;
04/02/20	J. Hardin	1.80	Review Motion to Amend; REDACTED telephone conference with P. Eddins regarding next steps; telephone call from REDACTED regarding Plaintiff's emails;
04/03/20	T. Brandon	0.60	Prepare request for additional Berg copyright; confer with L. Staniar regarding same; confer with Copyright office regarding request;
04/03/20	J. Jennison	0.10	Respond to email from J. Hardin regarding other infringements (.1);
04/03/20	K. Larson	1.10	Attend to correspondence from P. Eddins; research regarding prior art buckles; draft email to team regarding REDACTED
04/03/20	J. Hardin	0.40	Emails with client and team regarding letters Plaintiff sent to alleged copyright infringers;
04/05/20	J. Jennison	0.10	Review B. Berg Facebook description of enforcement action (.1);
04/06/20	T. Brandon	0.40	Continue researching copyright records; confer with copyright office and team regarding same;
04/06/20	K. Larson	0.20	Review motion to amend; conference regarding same;
04/06/20	J. Hardin	0.60	Review Amended Complaint; REDACTED
04/07/20	T. Brandon	0.20	Confer with Copyright office regarding estimate for Berg Copyright records; REDACTED confer with K. Larson and J. Hardin regarding same;

INVOICE #: 6195628

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
04/08/20	J. Hardin	0.50	Telephone conference with REDACTED regarding Plaintiff REDACTED
04/09/20	J. Vana	0.20	Review sanctions opinion against opposing counsel;
04/09/20	K. Larson	0.30	Attend to correspondence from other Berg defendant; conference with team regarding next steps and strategy;
04/09/20	J. Hardin	0.80	Telephone conference with REDACTED
04/10/20	J. Vana	0.70	Analyze defense strategy; internal conference regarding same;
04/10/20	T. Brandon	0.20	Review copyright requests and confer with J. Hardin regarding same;
04/15/20	K. Larson	0.20	Attend to correspondence; research regarding prior Liebowitz lawsuits in Texas;
04/15/20	J. Hardin	0.20	Review material from REDACTED regarding Pro Hac Vice application;
04/16/20	J. Vana	0.40	Analyze response strategy for copyright infringement lawsuit in light of amended complaint and communications by plaintiff to third parties;
04/16/20	J. Jennison	1.10	Review recent sanctions order against Liebowitz (.3); REDACTED email K. Larson regarding same (.2); review Amended Complaint (.1); respond to emails from J. Hardin regarding strategy (.2);
04/16/20	K. Larson	1.40	Research regarding prior Liebowitz admissions in Texas; conference with team regarding same;
04/16/20	J. Hardin	0.20	Correspondence to client;
04/16/20	D. Kimmons	1.40	Retrieve filings related to attorney's admission in TX courts;
04/17/20	J. Vana	0.40	Review correspondence from P. Eddins regarding R. Berg communications to third parties;
04/17/20	J. Jennison	0.60	Respond to J. Hardin email regarding strategy (.6);
04/17/20	K. Larson	2.90	Draft recommendations regarding case strategy; legal research regarding REDACTED legal research regarding pro hac vice admission;
04/17/20	J. Hardin	1.30	Telephone conference with J. Vana regarding next steps; telephone conference with P. Eddins regarding case status and next steps; follow-up call with J. Vana;

0.20

INVOICE #: 6195628

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES	
04/20/20	J. Vana	0.20	Review information regarding legal sanctions against Richard Liebowitz;	
04/20/20	T. Brandon	0.10	Review filed Amended Complaint and confer with K. Larson regarding same;	
04/20/20	J. Jennison	0.10	Review email from P. Eddins to third parties (.1);	
04/20/20	K. Larson	2.70	Conduct legal research regarding REDACTED review court order sanctioning Mr. Liebowitz; conference regarding pro hac vice admission and strategy regarding case planning;	
04/20/20	J. Hardin	1.60	Review sanctions Order against Liebowitz, analysis of next steps, and correspondence to team regarding same;	
04/21/20	J. Jennison	1.40	Read sanctions order (.2); REDACTED call with J. Hardin, J. Vana and K. Larson regarding strategy;(1.0);	
04/21/20	K. Larson	2.60	Team telephone conference regarding case strategy and action items; begin drafting Answer to Amended Complaint;	1.0
04/21/20	J. Hardin	0.50	Telephone conference with internal team regarding strategy;	
04/21/20	J. Hardin	0.50	Follow up call with K. Larson on specific next steps;	
04/22/20	K. Larson	4.40	Begin drafting Answer to Amended Complaint; legal research regarding Rule 11 motions REDACTED legal research regarding REDACTED ; legal research regarding REDACTED	
04/23/20	K. Larson	2.20	Legal research regarding fee shifting REDACTED ; finish drafting Answer; conference regarding same;	1.10
04/24/20	J. Vana	0.40	Analyze litigation strategy; internal conference regarding same;	
04/24/20	J. Jennison	0.40	Respond to emails from J. Hardin and K. Larson regarding strategy (.4);	
04/24/20	K. Larson	2.30	Legal research regarding prevailing party in copyright dispute REDACTED provide revisions to Answer to Amended Complaint; conference with J. Hardin regarding same; REDACTED	1.80
04/24/20	J. Hardin	2.10	Review and revise Answer to Amended Complaint (1.5); prepare strategy email to P. Eddins (.6);	1.0

INVOICE #: 6195628

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
04/27/20	J. Vana	0.40	Review strategic assessment of lawsuit strategy; internal conference regarding same;
04/27/20	K. Larson	2.50	Review filings made in Berg v. Symons case for admissions relevant in current matter;
04/27/20	J. Hardin	1.10	Finalize email to P. Eddins regarding strategy (.4); review Rule 11 cases and findings from K.Larson (.4); review and analysis regarding copyright registrations and issues flagged by internal team (.3);
04/28/20	J. Vana	0.40	Review documents from Berg v. Symons litigation;
04/28/20	J. Jennison	0.20	Confer regarding summary judgment motion (.2);
04/28/20	K. Larson	4.00	Continue research regarding admissions in Berg v. Symons case; draft memo to team summarizing research findings; conference with J. Hardin regarding Rule 11 motion;
04/28/20	J. Hardin	0.60	Telephone conference with K. Larson regarding Plaintiff's ability to withdraw Complaint after Defendant files Rule 11 motion and her findings after reviewing the Berg/Symons case (.4); telephone conference with J. Vana (.2);
04/29/20	J. Jennison	0.50	Call with Perkins team regarding summary judgment strategy (.5);
04/29/20	K. Larson	0.80	Participate in team conference regarding summary judgment strategy and Berg's prior designs; research regarding prior buckle copyright registrations;
04/29/20	J. Hardin	0.90	Work session with internal team (.5); telephone conference with P. Eddins and J. Vana (.4);
04/30/20	J. Vana	0.60	Analyze priority issue for beaded buckle design; review copyright documents in connection with same;
04/30/20	K. Larson	2.20	Review prior Berg copyright registrations and draft memo to team regarding same; update Answer to Amended Complaint; conference with J. Hardin regarding same;
04/30/20	J. Hardin	2.20	Analyze Amended Complaint and draft discovery requests; draft letter demanding production of documents;
TOTAL		HOURS	
		60.20	

1.0

PERKINScoie

INVOICE #: 6195628

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES

\$28,000.00

FOR DISBURSEMENTS AND OTHER SERVICES THROUGH 04/30/20

DESCRIPTION	AMOUNT
USPTO - 8034378 75092298 . CERTIFIED OR UNCERTIFIED COPY OF TRADEMARK.RELATED FILE WRAPPER AND CONTENTS	\$50.00
USPTO - 8034378 CERTIFIED OR UNCERTIFIED COPY OF TRADEMARK.RELATED FILE WRAPPER AND CONTENTS	\$0.50

TOTAL FOR DISBURSEMENTS AND OTHER SERVICES

\$50.50

TOTAL DUE THIS INVOICE

\$28,050.50

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359.8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359.9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6211069	BILL DATE June 28, 2020
ACCOUNT # 064984.7008	DUE DATE July 28, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES: \$38,350.00	DISBURSEMENTS AND OTHER SERVICES: \$49.50	LATE CHARGES:	TOTAL: \$38,399.50
WRITE DOWNS FOR SERVICES: \$(1,400.00)	WRITE DOWNS FOR DISBURSEMENTS: \$0.00	WRITE DOWNS FOR LATE CHARGES	WRITE DOWN TOTAL: \$(1,400.00)
TOTAL FOR SERVICES: \$36,950.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$49.50	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$36,999.50

Payment due in U.S. Currency

REDACTED

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 05/31/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES	
05/01/20	J. Vana	0.30	Review and revise correspondence to opposing counsel regarding discovery deficiencies;	
05/01/20	J. Jennison	0.20	Review emails regarding REDACTED (.1); review Liebowitz admission form (.1);	
05/01/20	K. Larson	2.30	Begin revising discovery requests; revise demand letter to R. Liebowitz regarding discovery; review P. Eddin's input to Answer to Amended Complaint; conference with J. Hardin regarding same;	1.10
05/01/20	J. Hardin	2.30	Finish discovery requests; correspondence with R. Liebowitz regarding admission to Eastern District of Texas; draft document production letter;	1.0
05/03/20	J. Jennison	0.30	Review correspondence regarding answer and respond (.1); review email from J. Vana regarding REDACTED (.1); exchange emails with J. Hardin regarding same (.1);	0.40
05/04/20	T. Brandon	0.80	Finalize and file Amended Answer; confer with K. Larson regarding same;	
05/04/20	J. Jennison	0.20	Confer with J. Hardin regarding copyright issues REDACTED REDACTED	
05/04/20	K. Larson	3.20	Revise Amended Answer per input from P. Eddins and J. Hardin; conference with T. Brandon regarding same; telephone conference with P. Eddins regarding REDACTED ; continue drafting discovery;	1.50
05/04/20	J. Hardin	1.10	Research regarding R. Liebowitz's admission to Eastern District of Texas (.2); correspondence with J. Jennison on legal issues (.4); correspondence with K. Larson on discovery requests (.2); correspondence with P. Eddins on settlement discussions (.1); correspondence with REDACTED (.2);	
05/05/20	T. Brandon	0.50	Finalize and file corporate disclosure; confer with K. Larson regarding same;	1.0
05/05/20	K. Larson	3.20	Continue drafting discovery [2.0]; research regarding REDACTED REDACTED draft email to P. Eddins regarding same; [1.2];	
05/05/20	J. Hardin	0.80	Telephone conference with REDACTED telephone call to K. Larson regarding discovery and P. Eddins regarding settlement timing (.1);	

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
05/06/20	J. Vana	0.40	Review updated copyright registration information for buckle designs;
05/06/20	J. Jennison	0.20	Confer regarding summary judgment (.2);
05/06/20	K. Larson	1.40	<div> <div>REDACTED</div> <div>review</div> <div>research results regarding buckles by Crumrine and Weaver; conduct</div> <div>research regarding copyright protection for derivative works;</div> <div>REDACTED</div> <div>REDACTED</div> </div>
05/06/20	J. Hardin	1.10	<div> <div>Review and finalize discovery requests to Plaintiff (.7);</div> <div>REDACTED</div> <div>REDACTED</div> </div>
05/07/20	J. Jennison	0.50	<div> <div>Review and respond to email from J. Hardin regarding legal claims (.2);</div> <div>call with J. Hardin regarding strategy (.3);</div> </div>
05/07/20	K. Larson	1.40	Continue drafting discovery; conference with J. Hardin regarding same;
05/08/20	J. Jennison	0.80	Review discovery requests (.7); email J. Hardin regarding same (.1);
05/08/20	K. Larson	0.50	Research regarding admissions in Berg v. Symons case;
05/11/20	J. Vana	0.90	Review discovery issues;
05/11/20	J. Jennison	0.10	Review articles about Liebowitz sanctions and email team (.1);
05/12/20	J. Jennison	0.50	Call with J. Hardin and K. Larson regarding discovery (.5);
05/12/20	K. Larson	0.80	<div> <div>Begin drafting Motion for Partial Summary Judgment of Non-Infringement</div> <div>regarding Buckle Designs;</div> </div>
05/12/20	K. Larson	0.80	<div> <div>Review revised discovery requests; conference with J. Jennison and J.</div> <div>Hardin regarding same;</div> </div>
05/12/20	J. Hardin	1.60	<div> <div>Review revised discovery requests (1.2); internal correspondence</div> <div>regarding same (.4);</div> </div>
05/13/20	J. Jennison	0.20	Email J. Hardin with thoughts on expert witnesses (.2);
05/13/20	K. Larson	0.80	Conference with Perkins team regarding expert witnesses;
05/14/20	J. Vana	0.20	Internal conference regarding discovery strategy;
05/14/20	T. Brandon	0.10	Review discovery deadlines and submit portfolio updates to team;
05/14/20	K. Larson	0.80	Research regarding summary judgment motion regarding buckle claim;

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
05/14/20	K. Larson	1.00	Conference with J. Hardin regarding discovery requests; review discovery requests from Berg; revise correspondence to R. Liebowitz regarding discovery;
05/14/20	J. Hardin	1.00	Finalize and serve discovery requests;
05/15/20	K. Larson	2.20	Continue drafting Motion for Partial Summary Judgment of Non-Infringement regarding buckle claim;
05/17/20	J. Jennison	0.20	Email J. Hardin regarding motion to compel (.2);
05/17/20	J. Hardin	0.10	Pull information related to R. Liebowitz's changing positions and email group regarding proposed strategy REDACTED
05/18/20	J. Jennison	0.50	Email J. Hardin regarding motion to compel (.2); call with J. Hardin regarding motion to compel (.3);
05/18/20	K. Larson	0.90	Review sanctions orders against Liebowitz; conference with PC team regarding discovery abuse and strategy REDACTED
05/18/20	K. Larson	0.90	Continue drafting Motion for Partial Summary Judgment of Non-Infringement regarding buckle design;
05/18/20	J. Hardin	0.10	Work session on response to R. Liebowitz's changing stories on document production REDACTED
05/19/20	T. Brandon	0.30	Review previous document productions and confer with K. Larson regarding same;
05/19/20	K. Larson	2.00	Continue drafting Motion for Partial Summary Judgment of Non-Infringement; legal research regarding recovery of fees and costs pursuant to Section 505; REDACTED
05/20/20	K. Larson	2.00	Conference with J. Hardin regarding Motion for Partial Summary Judgment of Non-Infringement; revise same; legal research in connection with same REDACTED
05/20/20	J. Hardin	0.50	Review and comment on Motion for Summary Judgment; telephone conference with K. Larson regarding same;
05/21/20	K. Larson	5.00	Begin drafting Rule 11 letter to R. Liebowitz and accompanying Motion for Sanctions; legal research in connection with same;
05/21/20	K. Kimura	0.60	Pull docket entries relating to Rule 11 sanctions filed in a Southern District of New York case for K. Larson;
05/22/20	J. Vana	0.20	Review document production from Berg;

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
05/22/20	J. Jennison	0.80	Revise draft summary judgment motion (.8);
05/22/20	K. Larson	2.30	Revise Motion for Partial Summary Judgment per input from J. Jennison; draft Declaration of P. Eddins in support of same;
05/22/20	K. Larson	1.00	Review Berg document production REDACTED conference with team regarding Berg document production REDACTED
05/22/20	J. Hardin	0.30	Review documents forwarded by R. Liebowitz;
05/26/20	T. Brandon	0.40	Review discovery deadlines and confer with K. Larson regarding same;
05/26/20	J. Jennison	0.20	Review email correspondence regarding Berg document production (.1); respond to email from J. Hardin regarding summary judgment motion (.1);
05/26/20	K. Larson	2.30	Review sanctions orders against Liebowitz; conference with PC team regarding discovery abuse REDACTED begin drafting responses to Berg's requests for production;
05/26/20	J. Hardin	1.50	Review and revise Motion for Summary Judgment and correspond with team on next steps and concerns with discovery; 1.0
05/27/20	T. Brandon	0.80	Investigate copyright registration certificates online and report to K. Larson;
05/27/20	J. Jennison	0.70	Respond to email from J. Hardin regarding document production (.1); call with J. Hardin regarding copyright registrations (.3); call with K. Larson regarding same (.2); review email from K. Larson (.1);
05/27/20	K. Larson	4.00	Begin collating cases involving sanctions orders against Liebowitz; conference with J. Jennison regarding Berg's discovery failures; provide caselaw to J. Hardin regarding consequences for failure to produce registration materials in copyright suit; continue drafting responses to requests for production of documents; draft answers to interrogatories;
05/27/20	J. Hardin	0.30	Update to P. Eddins;
05/27/20	K. Kimura	0.30	REDACTED
05/28/20	J. Jennison	0.30	REDACTED
05/28/20	K. Larson	1.80	Update responses to requests for production and answers to interrogatories per input from J. Hardin; REDACTED

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
05/28/20	K. Larson	2.50	Revise Motion for Partial Summary Judgment regarding buckle claim per input from J. Hardin; draft Declaration of J. Crumrine LaShelle in support of same; draft Declaration of C. Kraft in support of same;
05/28/20	J. Hardin	2.40	Revise discovery responses (1.5); telephone conference with P. Eddins on status (.9);
05/28/20	J. Walker	0.40	Research prior acquisition and dissolved entity for K. Larson;
05/29/20	J. Vana	1.30	Review and revise summary judgment motion;
05/29/20	J. Jennison	0.10	Review article on Liebowitz sanctions (.1);
05/29/20	K. Larson	3.40	Update responses to requests for production and answers to interrogatories per input from J. Hardin; REDACTED conference with P. Eddins regarding discovery responses;
05/29/20	J. Hardin	1.00	REDACTED
05/31/20	J. Jennison	0.30	Respond to email about REDACTED review email from K. Larson about document production (.1);
TOTAL		HOURS 74.20	

SUBTOTAL FOR SERVICES

\$38,350.00

LESS FURTHER REDUCTION IN FEES PER CLIENT LEAD

\$(1,400.00)

SERVICES

\$36,950.00

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR DISBURSEMENTS AND OTHER SERVICES THROUGH 05/31/20

DESCRIPTION	AMOUNT
	REDACTED
US Bank - Filing Fees - T. Billable, Application Name: TXED CM ECF, Pay.gov Tracking ID: 26N6S4V2, 01/30/2020	\$100.00

TOTAL FOR DISBURSEMENTS AND OTHER SERVICES

\$49.50

SUMMARY OF SERVICES THROUGH 05/31/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	14.10	840.00	11,844.00
J. Jennison	6.10	885.00	5,398.50
J. Vana	3.30	675.00	2,227.50
PARTNER	23.50		19,470.00
K. Larson	46.50	385.00	17,902.50
ASSOCIATE	46.50		17,902.50
T. Brandon	2.90	225.00	652.50
PARALEGAL	2.90		652.50
K. Kimura	0.90	250.00	225.00
J. Walker	0.40	250.00	100.00
INDIRECT STAFF	1.30		325.00
Total	74.20		\$38,350.00

TOTAL DUE THIS INVOICE
\$36,999.50

PERKINScoie

INVOICE #: 6211069

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

REDACTED

1201 Third Avenue, Suite 4900
 Seattle, Washington 98101
 PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
 ACCOUNTING: 206.359.3143
 FAX: 206.359 9000

PERKINScoie

M & F Western Products
 Attn: Paul Eddins
 P O Box 208
 Sulphur Springs, TX 75483

INVOICE # 6225608	BILL DATE July 25, 2020
ACCOUNT # 064984.7008	DUE DATE August 24, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$74,294.50	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$24.82	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$74,319.32
---	--	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 06/30/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES	
06/01/20	J. Jennison	0.90	Call with J. Hardin regarding strategy (.5); email K. Larson regarding same (.1); call with K. Larson regarding same (.3);	
06/01/20	K. Larson	2.40	Update responses to requests for production and answers to interrogatories per input from J. Hardin; conference regarding document requests REDACTED	
06/01/20	D. Kimmons	3.20	Compile cases regarding REDACTED	
06/02/20	J. Jennison	0.50	Email K. Larson regarding discovery issues (.1); call with J. Hardin regarding same (.4);	
06/02/20	K. Larson	2.60	Continue reviewing additional documents from P. Eddins for possible supplemental production; conference regarding same;	
06/02/20	K. Larson	1.00	Conference regarding summary judgment motion and legal research regarding proof of ownership; REDACTED	
06/02/20	J. Hardin	0.50	Review material from REDACTED on sanctions against R. Liebowitz;	
06/03/20	J. Vana	0.30	Analyze discovery matters and summary judgment strategy;	
06/03/20	J. Jennison	0.60	Call with J. Hardin regarding discovery (.4); respond to K. Larson email regarding summary judgment strategy (.2);	
06/03/20	K. Larson	0.90	Conference regarding document production and motion for summary judgment; correspond with P. Eddins regarding document production;	← 0.40
06/03/20	J. Hardin	0.50	Telephone conference with J. Jennison regarding Motion for Summary Judgment and discovery disputes;	← 0.40
06/03/20	J. Hardin	0.80	Strategy session with J. Jennison (.3); strategy email regarding various moving pieces and next steps (.5);	
06/04/20	T. Brandon	1.10	Confer with K. Larson regarding supplemental production of documents; prepare and finalize same; REDACTED	
06/04/20	K. Larson	2.50	Conference with J. Hardin regarding discovery responses and motion to compel; update same; conference with P. Eddins regarding same; conference with T. Brandon regarding document production; review documents for production;	

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/04/20	K. Larson	1.60	Update Motion for Partial Summary Judgment regarding buckle claim; update declarations in support of same; conference with P. Eddins regarding same;
06/04/20	J. Hardin	0.50	Telephone conference with K. Larson regarding next steps;
06/05/20	J. Jennison	0.30	Call with K. Larson regarding document production (.3);
06/05/20	K. Larson	0.90	Update Motion for Partial Summary Judgment regarding buckle claim based on further input from P. Eddins; update declarations in support of same;
06/05/20	K. Larson	3.00	Continue reviewing additional documents from P. Eddins for possible supplemental production; correspond with P. Eddins regarding same; draft Supplemental Initial Disclosures REDACTED conference with J. Jennison regarding document production;
06/05/20	J. Hardin	0.40	Review emails from K. Larson regarding Plaintiff's Facebook posts;
06/08/20	J. Vana	0.30	Review status of discovery and mediation issues; internal conference regarding same;
06/08/20	T. Brandon	3.80	Confer with K. Larson regarding supplemental document production; organize and prepare same;
06/08/20	J. Jennison	1.70	Respond to J. Hardin email regarding meet and confer (.1); review and revise draft motion to compel (.3); respond to email from K. Larson regarding discovery (.2); review and revise summary judgment draft and declarations (.7); revise email regarding financial information (.2); review emails regarding document production (.1); respond to email from H. Hardin regarding motion to compel (.1);
06/08/20	K. Larson	2.20	Conference with T. Brandon regarding document production; conference with P. Eddins regarding document production, damages related documents, expert witnesses; review and revise motion to compel and conference with J. Hardin regarding same;
06/08/20	K. Larson	1.20	Update declarations in support of Motion for Summary Judgment regarding buckle claim; draft declaration of P. Eddins in support of same;
06/08/20	J. Hardin	2.40	Prepare exhibits (1.5); finalize Motion (.9); work session on Motion for Summary Judgment and discovery (0.0);
06/08/20	J. Hardin	0.70	Attend telephone conference with R. Liebowitz (.4); update team (.3);
06/09/20	T. Brandon	7.00	Continue preparing documents for supplemental production; confer with K. Larson regarding same;

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/09/20	J. Jennison	1.10	Respond to J. Hardin email regarding mediation and motion to compel (.4); respond to emails about discovery (.1); review draft motion to compel (.5); email J. Hardin regarding same (.1);
06/09/20	K. Larson	1.00	Update LaShelle Declaration in support of motion for summary judgment regarding buckle claim; review exhibits in support of same; conference regarding Motion for Summary Judgment strategic considerations;
06/09/20	K. Larson	4.20	Continue reviewing additional documents from P. Eddins for possible supplemental production; conference with T. Brandon regarding document production; review and revise Motion to Compel; review and revise Answers to Interrogatories; conference regarding Motion to Compel and discovery issues;
06/09/20	J. Hardin	3.10	5.20 Telephone call to Magistrate regarding Plaintiff's attendance at mediation (.3); update to team and analysis of next steps (.3); revise Motion to Compel (1.5); revise Affidavit of J. Crumrine for Motion for Summary Judgment (.8); revise Rule 11 letter to R. Liebowitz (.8); begin revising Rule 11 Motion (1.5);
06/10/20	T. Brandon	4.10	Finalize and serve documents for production; finalize and file Motion to Compel and related declarations; confer with K. Larson regarding same;
06/10/20	J. Jennison	0.40	Emails with J. Hardin regarding Berg availability (.2); review motion to compel (.2);
06/10/20	K. Larson	2.10	Finalize declarations in support of Motion for Summary Judgment regarding buckle claim; update summary judgment motion;
06/10/20	K. Larson	3.10	Conference regarding document production; attend to review of documents for production; review Motion to Compel Mandatory Disclosures and legal research regarding same;; conference regarding same and regarding filing;
06/10/20	J. Hardin	2.00	Finalize and file Motion to Compel; finalize document production; correspondence to R. Liebowitz; work session on finalizing Motion for Summary Judgment REDACTED
06/11/20	T. Brandon	1.70	Review and document correspondence regarding Motion to Compel and document production; confer with K. Larson regarding motion for partial summary judgment; draft proposed order and certificate of service;
06/11/20	K. Larson	0.40	Finalize motion for summary judgment and related declarations and exhibits;
06/11/20	K. Larson	2.00	Correspond with P. Eddins regarding document production, supplemental disclosures and summary judgment motion; update supplemental initial disclosures; review documents in connection with same;

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/11/20	K. Smith	0.60	Cite-check motion;
06/11/20	J. Hardin	0.40	Review Motion for Summary Judgment and telephone conference with K. Larson regarding same;
06/12/20	J. Vana	0.60	Review discovery response issues;
06/12/20	T. Brandon	2.70	Finalize and file motion for partial summary judgment; confer with K. Larson regarding same;
06/12/20	K. Larson	1.30	Finalize Answers to Interrogatories and Requests for Production of Documents; conference regarding same; correspond with P. Eddins regarding same;
06/12/20	K. Larson	0.30	Update responses to Requests for Production per input from P. Eddins;
06/12/20	J. Hardin	0.60	Revise Interrogatory responses;
06/13/20	J. Hardin	3.00	Revise Motion for Sanctions (3.0); REDACTED
06/15/20	T. Brandon	2.90	Finalize/serve additional documents for production and discovery responses; confer with K. Larson regarding same;
06/15/20	K. Larson	2.30	Update responses to discovery per input from P. Eddins; conference regarding same; update Supplemental Initial Disclosures; review and revise Rule 11 Motion for Sanctions (0.8 hr);
06/15/20	J. Hardin	2.00	Revise Rule 11 Motion REDACTED
06/16/20	K. Larson	1.50	Review discovery responses from Berg; telephone conference with P. Eddins regarding same; legal research regarding invalidity defense;
06/17/20	M. McDermott	3.50	Cite check motion for sanctions against plaintiff's counsel;
06/17/20	T. Brandon	0.20	Review court deadlines regarding mandatory disclosures; confer with K. Larson regarding same;
06/17/20	K. Larson	6.50	Revise Motion for Rule 11 Sanctions, conference with J. Hardin regarding same, legal research in support of same [4.0 hr]; correspond with P. Eddins regarding discovery issues REDACTED
06/17/20	A. Perkins	1.20	Research REDACTED copyright cases for K. Larson;
06/17/20	C. Moua	2.00	Locate FDRCP Rule 11 cases from federal court in Texas for K. Larson;

0.80

4.0

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
REDACTED			REDACTED
			0.20
06/18/20	T. Brandon	1.60	Review copyright issues and costs; confer with K. Larson regarding same; confer with K. Larson regarding researching local rules regarding appendices to rule 11 motion; finalize and serve Supplemental Initial Disclosures; confer with K. Larson regarding same;
06/18/20	J. Jennison	0.60	Review Rule 11 motion (.4); call with J. Hardin regarding same (.2);
06/18/20	K. Larson	0.20	Conference regarding exhibits for Rule 11 motion;
06/18/20	K. Larson	1.10	Correspond with P. Eddins regarding Supplemental Initial Disclosures REDACTED REDACTED conference regarding legal research
			0.30
06/18/20	A. Perkins	1.60	Research REDACTED copyright cases for K. Larson;
06/18/20	J. Hardin	0.70	Telephone conference with K. Larson regarding Rule 11 Motion, document production, REDACTED
06/21/20	J. Jennison	0.60	Review draft Rule 11 motion (.3); email K. Larson and J. Hardin regarding same (.2); review email regarding summer associate project and reply (.1);
06/22/20	T. Brandon	3.60	Review cost estimate from Copyright office and report same to K. Larson; prepare draft proposed order,
06/22/20	J. Jennison	0.10	Respond to K. Larson email regarding strategy (.1);
06/22/20	K. Larson	0.50	Correspond with P. Eddins regarding Symons case REDACTED conference with team regarding strategic considerations REDACTED
06/22/20	K. Larson	3.00	Update Motion for Rule 11 Sanctions per input from J. Jennison; conference with J. Hardin regarding additional Liebowitz sanctions cases; conference with T. Brandon regarding exhibits and appendix in support of Motion for Rule 11 Sanctions and review same; revise Proposed Order in support of same;
06/22/20	A. Perkins	0.40	Retrieve dockets and motions for K. Larson;
06/23/20	J. Vana	0.40	Review sanctions motion;
06/23/20	T. Brandon	1.60	Confer with K. Larson regarding copyright requests and prepare estimate for same; research rule 11 letters and report same to K. Larson; prepare certificate of service;

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/23/20	K. Larson	2.00	Revise Rule 11 letter to R. Liebowitz; correspond with P. Eddins regarding Motion for Rule 11 sanctions; finalize Motion for Sanctions and related items for service;
06/23/20	K. Larson	1.20	Conference with P. Eddins regarding case strategy REDACTED, expert witness disclosure and discovery; REDACTED
06/24/20	T. Brandon	0.70	Finalize Rule 11 letter, motion and attachments; confer with K. Larson regarding same;
06/24/20	J. Jennison	0.30	Confer regarding timing of Rule 11 motion (.2); confer regarding H. Weaver as potential expert (.1);
06/24/20	K. Larson	0.60	Telephone conference with P. Eddins regarding Motion for Rule 11 sanctions; conference with J. Hardin regarding same; conference with T. Brandon regarding service details;
06/24/20	K. Larson	3.40	Telephone conferences with H. Weaver regarding expert testimony and history of Berg cases; conference with J. Hardin regarding same and regarding Weaver expert report; begin preparing Expert Disclosures;
06/25/20	T. Brandon	1.40	Confer with K. Larson regarding rule 11 letter; Finalize and serve rule 11 letter, Motion for Sanctions and supporting documents;
06/25/20	J. Jennison	0.10	Confer with K. Larson and J. Hardin regarding expert report (.1);
06/25/20	K. Larson	0.60	Conference regarding Rule 11 letter to R. Liebowitz; review and approve materials for service;
06/25/20	K. Larson	4.90	Review Berg's response to M&F Western's Motion to Compel; conference with J. Jennison regarding same; review materials regarding prior Symons case and H. Weaver testimony; draft outline of expert report of H. Weaver; conference regarding same;
06/25/20	J. Hardin	1.50	Analysis and initial draft of expert disclosures (1.2); telephone conference with client regarding Rule 11 motion (.3);
06/26/20	T. Brandon	1.40	Research rules on partial summary judgment reply and report same to K. Larson; research/prepare Notice of Disclosure for expert witness disclosure and initial disclosures; confer with K. Larson and team regarding same;
06/26/20	J. Jennison	0.60	Review H. Weaver witness statement (.6):

0.20

0.40

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/26/20	K. Larson	3.50	Conference with J. Hardin regarding Expert Report of H. Weaver; conferences with H. Weaver regarding same; update report per input from H. Weaver; update exhibits; conference with P. Eddins regarding H. Weaver rate; update Expert Disclosures; conference regarding court submission attesting to service of Expert Disclosures;
06/26/20	K. Larson	2.30	Begin drafting Reply in Support of Motion to Compel; conference regarding same;
06/26/20	J. Hardin	2.70	Review and finalize expert report of H. Weaver (1.8()); review Motion for Summary Judgment Response (.9);
06/29/20	J. Vana	0.80	Review response to partial Summary Judgment motion; exchange correspondence with P. Eddins regarding same;
06/29/20	T. Brandon	1.50	Review outstanding USDC deadlines and submit portfolio updates to team; finalize/serve Expert Witness Disclosures; finalize/file Notice of Disclosure; confer with K. Larson regarding same; review discovery served and report same to K. Larson;
06/29/20	J. Jennison	0.40	Review article about Liebowitz sanctions (.1); review Liebowitz opposition to MSJ (.3);
06/29/20	K. Larson	1.50	Review Berg's Response to Motion for Partial Summary Judgment; conference regarding same and regarding strategy for response;
06/29/20	K. Larson	3.40	Review decision sanctioning Liebowitz in Usherson case; conference regarding same; correspond with P. Eddins regarding Liebowitz sanctions and expert disclosures; update reply in support of Motion to Compel;
06/29/20	J. Dini	3.00	Analyze case law regarding requiring in-person deposition of plaintiffs in copyright infringement actions;
06/29/20	K. Kimura	0.20	Pull opinion regarding sanctions on attorney for K. Larson;
06/29/20	D. Kimmons	0.40	Retrieve any motions requiring opposing party to appear in person;
06/30/20	T. Brandon	0.20	Confer with team regarding next steps for reply to Motion for Partial Summary Judgment;
06/30/20	J. Jennison	0.40	Email J. Hardin and K. Larson regarding MSJ thoughts (.1); respond to email from J. Hardin regarding cross MSJ (.2); review draft reply brief on motion to compel (.1);
06/30/20	K. Larson	3.20	Begin drafting Reply in Support of Motion for Partial Summary Judgment; conference regarding same;

0.30

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/30/20	K. Larson	2.60	Revise Reply in Support of Motion to Compel; conference regarding same; legal research regarding REDACTED correspond with P. Eddins regarding Reply brief; conference regarding supplementing disclosures regarding REDACTED
06/30/20	C. Moua	1.00	Find what the affidavit was supporting in Berg v. Symons for K. Larson;
06/30/20	J. Hardin	1.00	Finalize Reply in Support of Motion to Compel;
TOTAL		HOURS	
		166.70	

SERVICES

\$74,294.50

REDACTED

SUMMARY OF SERVICES THROUGH 06/30/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	26.10	840.00	21,924.00
J. Jennison	8.60	885.00	7,611.00
J. Vana	2.40	675.00	1,620.00

INVOICE #: 6225608

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SUMMARY OF SERVICES THROUGH 06/30/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
PARTNER	37.10		31,155.00
J. Dini	3.00	410.00	1,230.00
K. Larson	77.00	385.00	29,645.00
ASSOCIATE	80.00		30,875.00
T. Brandon	35.50	225.00	7,987.50
M. McDermott	3.50	370.00	1,295.00
K. Smith	0.60	270.00	162.00
PARALEGAL	39.60		9,444.50
D. Kimmons	3.60	250.00	900.00
K. Kimura	0.20	250.00	50.00
C. Moua	3.00	250.00	750.00
A. Perkins	3.20	350.00	1,120.00
INDIRECT STAFF	10.00		2,820.00
Total	166.70		\$74,294.50

TOTAL DUE THIS INVOICE \$74,319.32

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
ACCOUNTING: 206.359.3143
FAX: 206.359 9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

INVOICE # 6250680	BILL DATE August 31, 2020
ACCOUNT # 064984.7008	DUE DATE September 30, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$41,114.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$2.70	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$41,116.70
---	---	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6250680

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 07/31/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
06/30/20	J. Hardin	0.50	Analysis regarding case strategy REDACTED
07/01/20	T. Brandon	1.10	Review outstanding TTAB deadlines and submit portfolio updates to team; Prepare draft supplemental initial disclosures; confer with K. Larson regarding same; confer with K. Larson and J. Hardin regarding reply in support of motion to compel;
07/01/20	K. Larson	3.20	Revise Response to Motion for Partial Summary Judgment on Buckle Claim; legal research in support of same; conference regarding same;
07/01/20	K. Larson	1.50	Revise Reply in Support of Motion to Compel; conference regarding same; attend to finalization of same for filing; conference regarding mediation dates; telephone conference with P. Eddins regarding case strategy REDACTED
07/01/20	J. Hardin	2.20	Finalize Reply in Support of Motion to Compel; work session on mediation and overall strategy;
07/02/20	J. Jennison	0.90	Revise MSJ reply brief (.2); call with J. Hardin and K. Larson regarding strategy (.7);
07/02/20	K. Larson	1.70	Conference regarding reply in support of Motion for Partial Summary Judgment regarding buckle claim; finalize reply and prepare for filing; correspond with P. Eddins regarding same;
07/02/20	J. Hardin	1.30	Work session finalizing Reply in Support of Motion for Summary Judgment;
07/06/20	T. Brandon	0.50	Research local rules regarding redactions; confer with K. Larson regarding same;
07/06/20	J. Jennison	0.40	Review draft discovery (.3); email K. Larson regarding same (.1);
07/06/20	K. Larson	1.30	Draft interrogatories; conference with team regarding same; research regarding historic buckle and jewelry design;
07/06/20	J. Hardin	0.30	Review and comment on additional discovery requests to Plaintiff;
07/09/20	T. Brandon	0.20	Review outstanding USDC deadlines and submit portfolio updates to team;
07/09/20	J. Jennison	0.10	Call with J. Hardin regarding order setting hearing (.1);

INVOICE #: 6250680

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
07/09/20	K. Larson	1.50	Review Court Order regarding hearing regarding Motion to Compel; conference regarding same; correspond with P. Eddins regarding same; conference regarding docketing matters; conference regarding discovery, depositions and document authentication declarations;
07/09/20	J. Hardin	0.20	Receive Order setting a hearing and internal discussion regarding same;
07/10/20	K. Larson	0.90	Conference regarding discovery and depositions; review Mediation Order; conference regarding same; correspond with P. Eddins regarding same;
07/13/20	J. Jennison	0.20	Confer regarding discovery and summary judgment issues; ← 0.10
07/13/20	K. Larson	0.90	Conference regarding case planning and discovery; telephone conference with P. Eddins regarding same; attend to docket items;
07/13/20	J. Hardin	0.60	Case strategy and planning (.4); review settlement offer and response to Rule 11 letter / Motion by R. Liebowitz and correspond internal and with client regarding same (.2); ← 0.20
07/14/20	K. Larson	1.40	Conference regarding strategy for discovery and mediation; correspond with R. Liebowitz regarding deposition of Berg; correspond with R. Liebowitz regarding discovery pertaining to documents from Berg v. Symons case;
07/14/20	K. Larson	0.50	Assess R. Liebowitz response to Rule 11 letter; update Rule 11 motion REDACTED conference regarding same;
07/15/20	T. Brandon	0.10	Confer with team on filing Motion for Sanctions;
07/15/20	K. Larson	2.90	Draft letter to R. Liebowitz regarding response to settlement demand; begin drafting mediation letter;
07/15/20	J. Hardin	0.30	Telephone conference with Court regarding R. Liebowitz's filing (2.); update to team regarding same (.1);
07/16/20	K. Larson	2.70	Continue drafting letter to mediator regarding settlement demand; conference regarding same; conference regarding response to Berg demand; begin drafting declarations authenticating documents;
07/19/20	J. Vana	0.80	Analyze status of pending motions and hearings; review and revise letter to Magistrate Judge Love regarding mediation;
07/19/20	J. Jennison	0.50	Review draft mediation statement (.4); review draft letter to Liebowitz regarding settlement (.1);
07/19/20	J. Hardin	0.60	Review letter to mediator; revise settlement response to R. Liebowitz; draft correspondence regarding discovery and deposition scheduling; correspondence with client regarding same;

INVOICE #: 6250680

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
07/20/20	T. Brandon	0.20	Review mediation briefing deadlines and confer with K. Larson regarding same; confer with S. Coren regarding draft declarations;
07/20/20	K. Larson	2.00	Conference regarding discovery, depositions, hearing on motion to compel and mediation; revise draft letter to mediator regarding case background and settlement demand per discussion with J. Hardin; revise demand letter to R. Liebowitz;
07/20/20	J. Hardin	1.40	Revise letters based on comments from others (.4); telephone conference with P. Eddins regarding same (.4); update team (.3); work session finalizing letters to R. Liebowitz and mediator with K. Larson (.3);
07/20/20	J. Hardin	1.20	Finalize mediation packets for Judge Love (1.0); respond to Plaintiff's settlement offer (.2);
07/21/20	J. Vana	0.80	Review order granting summary judgment motion; draft correspondence to P. Eddins regarding same;
07/21/20	T. Brandon	1.40	Confer with K. Larson regarding Exhibits for declarations; review documents for authentication;
07/21/20	J. Jennison	0.10	Confer regarding extension for Berg;
07/21/20	K. Larson	5.10	Conference regarding order granting summary judgment regarding the Buckle Claim and regarding case strategy pertaining to Rule 11 motion; continue drafting declaration of C. Gist regarding Gist buckle documents; begin drafting declaration of J. Crumrine LaShelle regarding historic Crumrine jewelry designs; conference regarding deposition notice for Berg;
07/21/20	J. Hardin	3.10	Work session with E. Roberts on answering research issues related to an alien Plaintiff's inability to appear for any aspect of a trial and adding to a Rule 11 Motion (.4); receive and review Order Granting Motion for Partial Summary Judgment REDACTED (2.0); analysis of Plaintiff's request for an extension of discovery (.7);
07/22/20	J. Vana	0.40	Research status of sanctions order against R. Liebowitz;
07/22/20	T. Brandon	0.10	Confer with K. Larson regarding declarations for authentication;
07/22/20	K. Larson	3.30	Conference regarding possible extension of discovery deadlines and strategy regarding potential summary judgment motion and upcoming hearing; continue drafting declaration of J. Crumrine LaShelle to support further summary judgment motion and authenticate documents;

2.0

INVOICE #: 6250680

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES	
07/22/20	J. Hardin	1.90	Work session with J. Vana on upcoming hearings (.4); analysis of request to extend discovery (.3); further analysis on discovery extensions and overall case strategy given ruling on Motion for Summary Judgment (.4); work session on appropriateness of Rule 11 Motion REDACTED (.7); analysis of tomorrow's hearing (.4);	0.70
07/23/20	J. Vana	0.30	Review order regarding motion to compel discovery responses;	
07/23/20	J. Jennison	0.40	Confer with team regarding hearing;	
07/23/20	K. Larson	8.30	Prepare for hearing on Motion to Compel; participate in hearing regarding same; conference with P. Eddins and J. Hardin regarding same; conference with team regarding case strategy and further summary judgment motions; draft and file supplement to Motion to Compel; conference regarding Court's Order regarding Motion to Compel; continue drafting Declaration of J. Crumrine LaShelle in support of Motion for Summary Judgment (Cross Designs); correspond with P. Eddins regarding historic cross and jewelry designs;	
07/23/20	J. Hardin	3.30	Telephone conference with P. Eddins regarding today's hearing (.3); prepare for and attend hearing on Motion to Compel (.8); follow-up telephone conference with P. Eddins and K. Larson (.5); strategy and analysis (.4); work session with J. Vana and J. Jennison on next steps (.5); work session on Supplement to Motion to Compel as requested by Judge Kernodle (.5); work session on second Motion for Summary Judgment (.3);	
07/23/20	J. Hardin	0.50	Analyze Order from hearing;	
07/24/20	K. Larson	4.70	Continue drafting Declaration of J. Crumrine LaShelle in support of Motion for Summary Judgment (Cross Designs); update Declaration of C. Gist in support of same; correspond with P. Eddins regarding LaShelle Declaration; conference regarding Berg deposition and expert disclosures by Berg; conference regarding strategy pertaining to summary judgment motions;	
07/24/20	J. Hardin	2.00	Analysis on forthcoming Motion for Summary Judgment related to crosses and potential evidence; work session with K. Larson regarding same; correspondence with R. Liebowitz regarding expert designations;	
07/25/20	K. Larson	3.50	Draft motion for Summary Judgment regarding Cross Claims;	
07/26/20	K. Larson	4.30	Continue drafting Motion for Summary Judgment (Cross Designs); draft Declaration of P. Eddins in Support of Same; conference regarding strategy for summary judgment motion;	
07/27/20	J. Hardin	0.30	Correspondence with R> Liebowitz regarding expert deadline;	

INVOICE #: 6250680

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
07/29/20	J. Vana	0.20	Internal conference regarding additional copyright registration raised by opposing counsel;
07/29/20	T. Brandon	0.10	Confer with team regarding copyright record VA0000530294;
07/29/20	J. Jennison	0.10	Review correspondence regarding new copyright registration (.1);
07/29/20	J. Hardin	0.30	Review Registration from R. Liebowitz and work session on same;
07/31/20	J. Vana	0.40	Review evidence of third party cross designs;
TOTAL		HOURS	
		79.00	

SERVICES

\$41,114.00

FOR DISBURSEMENTS AND OTHER SERVICES THROUGH 07/31/20

DESCRIPTION	AMOUNT
Courthouse News Service - Courthouse News Service - Professional Services	\$2.70

TOTAL FOR DISBURSEMENTS AND OTHER SERVICES

\$2.70

SUMMARY OF SERVICES THROUGH 07/31/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	20.00	840.00	16,800.00
J. Jennison	2.70	885.00	2,389.50
J. Vana	2.90	675.00	1,957.50

PERKINScoie

INVOICE #: 6250680

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SUMMARY OF SERVICES THROUGH 07/31/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
PARTNER	25.60		21,147.00
K. Larson	49.70	385.00	19,134.50
ASSOCIATE	49.70		19,134.50
T. Brandon	3.70	225.00	832.50
PARALEGAL	3.70		832.50
Total	79.00		\$41,114.00

TOTAL DUE THIS INVOICE \$41,116.70

REDACTED

1201 Third Avenue, Suite 4900
 Seattle, Washington 98101
 PHONE: 206.359 8000

EMAIL: clientacct@perkinscoie.com
 ACCOUNTING: 206.359.3143
 FAX: 206.359 9000

PERKINScoie

M & F Western Products
 Attn: Paul Eddins
 P O Box 208
 Sulphur Springs, TX 75483

INVOICE # 6267623	BILL DATE September 30, 2020
ACCOUNT # 064984.7008	DUE DATE October 30, 2020

Matter Number / Name 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL FOR SERVICES: \$46,469.00	TOTAL FOR DISBURSEMENTS AND OTHER SERVICES: \$45.00	TOTAL FOR LATE CHARGES:	TOTAL DUE THIS INVOICE: \$46,514.00
---	--	----------------------------	--

Payment due in U.S. Currency

REDACTED

INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

FOR SERVICES THROUGH 08/31/20

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
07/31/20	J. Hardin	0.40	Respond to R. Liebowitz regarding new copyright registrations (.2); respond to R. Leibowitz regarding deposition scheduling (.2);
08/01/20	J. Hardin	1.10	Analyze Motion for Summary Judgment on crosses; strategy planning regarding same;
08/02/20	J. Jennison	0.10	Review email regarding REDACTED
08/03/20	T. Brandon	0.10	Review and update deadlines with team;
08/04/20	K. Larson	5.20	Revise Declaration of J. Crumrine LaShelle in support of Motion for Summary Judgment (Cross Designs) per input from P. Eddins; conference regarding summary judgment motion; correspond with P. Eddins regarding additional document production and depositions;
08/04/20	J. Hardin	0.50	Work session with K. Larson on Motion for Summary Judgment and next steps;
08/05/20	K. Larson	3.60	Draft Declaration of C. Kraft in support of Motion for Summary Judgment on Cross Designs; telephone conference with P. Eddins regarding declarations and supporting evidence; continue drafting Motion for Summary Judgment on Cross Designs;
08/06/20	J. Vana	0.40	Research expert designated by plaintiff;
08/06/20	T. Brandon	1.20	Research rules regarding expert witness disclosures; research Bluebook regarding citing docket; investigate Monique Compton including capturing Facebook page; confer with K. Larson and team regarding same;
08/06/20	J. Jennison	0.20	Confer with team regarding Berg expert report;
08/06/20	K. Larson	9.00	Continue drafting Motion for Summary Judgment (Cross Designs); research in connection with same; assess expert report of M. Compton and confer regarding strategy for responding to same; review documents for potential production;
08/06/20	J. Hardin	0.80	Analysis of Plaintiff's designation of M. Compton and correspondence to team regarding same;
08/07/20	J. Vana	0.40	Internal conference regarding discovery strategy; review evidence of beaded cross designs;
08/07/20	J. Jennison	0.20	Confer with team regarding expert report;

INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
08/07/20	K. Larson	6.40	Continue drafting Motion for Summary Judgment (Cross Designs); research in connection with same; update declarations of Gist, Eddins, Dees, LaShelle and Kraft; conference regarding summary judgment strategy; correspond with P. Eddins regarding Gist declaration;
08/07/20	J. Hardin	0.50	Analysis and internal discussion related to designation of M. Compton;
08/07/20	D. Kimmons	0.40	Retrieve filings and exh bits from Jane Envy v. Sam Moon Trading;
08/08/20	J. Vana	0.30	REDACTED
08/08/20	J. Jennison	0.80	Strategize regarding expert report (.3); respond to email from J. Hardin regarding same (.2); respond to email from J. Vana regarding expert deposition (.2); respond to email from K. Larson regarding proof of access (.1);
08/08/20	K. Larson	7.30	Revise Motion for Summary Judgment (cross claims); revise related declarations of LaShelle, Kraft, Eddins, Dees; conference regarding strategy for Motion for Summary Judgment and Berg's omissions in his allegations; conference regarding preparation of documents for filing in conjunction with Motion for Summary Judgment briefing;
08/09/20	J. Jennison	0.10	Review email from K. Larin regarding Gist Silversmiths (.1);
08/10/20	J. Vana	0.40	Analyze expert report for M. Compton; internal conference regarding same;
08/10/20	J. Pambianco	2.70	Review the memorandum in support of the motion for summary judgment on cross claims; obtain the cited sources and perform a cite check as requested;
08/10/20	T. Brandon	1.50	Prepare exhibits for summary judgment motion; confer with K. Larson/S. Coren regarding same;
08/10/20	K. Larson	1.20	Conference regarding Motion for Summary Judgment strategy and possible motion to strike REDACTED update brief regarding case citations;
08/10/20	J. Hardin	0.90	Review and analyze current draft of Motion for Summary Judgment (.5); work session with K. Larson regarding Motion for Summary Judgment and next steps (.4);
08/11/20	T. Brandon	0.50	Finalize/serve additional documents for production; confer with team regarding same; research M. Compton performing captures of LinkedIn pages;
08/11/20	J. Hardin	1.00	Review Declarations in support of Motion for Summary Judgment;

INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
08/12/20	T. Brandon	0.20	Forward Gist declaration and exh bits to client for review; confer with team regarding same;
08/12/20	K. Larson	2.60	Revise Motion for Summary Judgment (Cross Designs) per input from J. Hardin; revise declarations of Kraft and LaShelle; telephone conference with P. Eddins regarding Gist Declaration; revise same per input from P. Eddins; conference regarding strategy for Motion for Summary Judgment;
08/12/20	J. Hardin	3.00	Review and revise Motion for Summary Judgment and Declaration of C. Craft (2.5); work session with K. Larson regarding same (.5);
08/13/20	J. Vana	0.80	Review and revise partial summary judgment motion;
08/13/20	T. Brandon	2.30	Prepare proposed order and supplemental initial disclosures; review/research 617 and 288 registrations; finalize/serve document production and supplemental initial disclosures; confer with team regarding same;
08/13/20	J. Jennison	3.10	Confer with team regarding summary judgment motion (.1); call with J. Vana regarding focus of summary judgment argument (.1); revise summary judgment motion (2.7); review materials from Symonds case (.2);
08/13/20	K. Larson	0.50	Telephone conference with P. Eddins regarding Motion for Summary Judgment (Cross Designs) and potential declaration REDACTED conference with team regarding same;
08/14/20	J. Vana	0.20	Internal conference regarding summary judgment strategy;
08/14/20	T. Brandon	1.10	Confer with team regarding appendix; review and document correspondence regarding M&F supplemental disclosures and supplemental document production; prepare/serve supplemental document production; confer with K. Larson regarding same;
08/14/20	J. Jennison	0.90	Call with J. Hardin, K. Larson and J. Vana regarding summary judgment strategy (.7); read article regarding latest Liebowitz sanctions (.2);
08/14/20	K. Larson	7.40	Conference regarding Summary Judgment motion strategy and revisions and regarding case strategy pertaining to Order regarding Motion to Compel and potential motion to strike Berg's expert; revise Motion for Summary Judgment (Cross Designs) per input from team; revise declarations of Kraft, LaShelle and Eddins per input from P. Eddins; conference regarding supplemental document production; conference regarding evidence and declarations;
08/14/20	J. Hardin	0.50	Telephone conference with team regarding Motion for Summary Judgment on cross design;

INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES
08/14/20	J. Hardin	1.20	Telephone conference with G. Vance regarding remote deposition of Plaintiff (.2); work session with K. Larson on Motion for Summary Judgment (.3); participate with Motion for Summary Judgment strategy session (.5); review document production from Plaintiff (.2);
08/15/20	K. Larson	1.00	Conference regarding Summary Judgment motion; update same;
08/15/20	J. Hardin	1.00	Review and revise Motion for Summary Judgment and Affidavit of S. Dees;
08/16/20	T. Brandon	2.00	Prepare appendix; finalize Declaration of LaShelle; confer with K. Larson regarding same;
08/16/20	K. Larson	0.50	Update Summary Judgment Motion and LaShelle Declaration; conference regarding same;
08/16/20	J. Hardin	0.80	Review Declarations;
08/17/20	T. Brandon	1.40	Review and forward LaShelle exhibits to client and LaShelle for review; confer with team regarding same;
08/17/20	J. Jennison	0.90	Call with K. Larson regarding MSJ (.1); review draft MSJ (.6); email K. Larson regarding same (.2);
08/17/20	K. Larson	4.70	Update Summary Judgment Motion, LaShelle Declaration, Dees Declaration, Eddins Declaration and Kraft Declaration; conference regarding exhibits in support of same; review appendix in support of motion; telephone conference with P. Eddins regarding declarations;
08/17/20	B. Cobb	0.50	Redact exhibit A for filing;
08/18/20	T. Brandon	2.80	Confer with client regarding LaShelle exhibits; finalize/file Motion for Partial Summary Judgment; confer with K. Larson regarding same;
08/18/20	J. Jennison	0.10	Call with K. Larson regarding MSJ;
08/18/20	K. Larson	3.50	Finalize motion for filing per additional input from P. Eddins and delcarants; finalize related motions; conference regarding exhibits in support of motion and filing requirements;
08/19/20	J. Vana	0.60	Final review of Rule 11 motion;
08/19/20	K. Larson	0.20	Conference regarding Rule 11 motion and motion to show cause for failure to comply with Court's order regarding discovery;
08/20/20	T. Brandon	3.20	Finalize/file Motion for Sanctions; confer with K. Larson regarding same;

0.10



INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

DATE	ATTORNEY/ASSISTANT	HOURS	DESCRIPTION OF SERVICES	
				1.0
08/20/20	K. Larson	1.40	Update Rule 11 Motion and finalize for filing; revise proposed order in support of same; review exhibits in support of same; conference regarding filing; conference regarding case strategy in light of legal limitations for depositions in Vietnam;	0.60
08/21/20	T. Brandon	1.30	Finalize/file amended exhibits for Motion for Sanctions; finalize/serve third discovery requests; confer with team regarding same;	
08/21/20	K. Larson	0.60	Draft Third Set of Interrogatories; conference regarding same;	
08/23/20	J. Jennison	0.20	Share thoughts on Berg deposition with team;	
08/23/20	K. Larson	0.40	Finalize motion for filing per additional input from P. Eddins and delcarants; finalize related motions; conference regarding exhibits in support of motion and filing requirements;	
08/26/20	J. Hardin	0.20	Telephone call to Clerk on R. Liebowitz's failure to comply with Court Order;	
08/27/20	J. Vana	0.20	Internal conference regarding discovery issues;	
08/27/20	J. Jennison	0.10	Confer with team regarding Berg request for extension;	
08/27/20	K. Larson	0.70	Conference regarding update to declaration of C. Gist; conference regarding deposition of Berg and extension of briefing schedule;	
08/27/20	J. Hardin	0.60	Draft response emails to R. Liebowitz (.3); work session with K. Larson regarding strategy (.3);	
08/27/20	J. Hardin	0.20	Draft responsive emails to R. Liebowitz REDACTED	
08/28/20	K. Larson	0.60	Conference regarding response to R. Liebowitz request for extension and strategy relating to Berg's failure to comply with Court's order;	
08/28/20	J. Hardin	0.20	Analysis of issues with K. Larson;	
08/31/20	K. Larson	1.30	Conference regarding filing Amended Declaration of C. Gist; draft submission in connection with same; draft email to R. Liebowitz regarding deposition;	
08/31/20	J. Hardin	0.30	Email to R. Liebowitz regarding delay (.1); strategy email to team regarding certification failure (.2);	
TOTAL		HOURS		
		102.50		

INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

SERVICES

\$46,469.00

FOR DISBURSEMENTS AND OTHER SERVICES THROUGH 08/31/20

DESCRIPTION	AMOUNT
Staff overtime assistance	\$45.00

TOTAL FOR DISBURSEMENTS AND OTHER SERVICES

\$45.00

SUMMARY OF SERVICES THROUGH 08/31/20

ATTORNEY/ASSISTANT	HOURS	RATE	AMOUNT
J. Hardin	13.20	840.00	11,088.00
J. Jennison	6.70	885.00	5,929.50
J. Vana	3.30	675.00	2,227.50
PARTNER	23.20		19,245.00
K. Larson	58.10	385.00	22,368.50
ASSOCIATE	58.10		22,368.50
T. Brandon	17.60	225.00	3,960.00
J. Pambianco	2.70	265.00	715.50
PARALEGAL	20.30		4,675.50
B. Cobb	0.50	160.00	80.00
E-DISCOVERY SERVICES & STRATEGY ATTORNEY	0.50		80.00
D. Kimmons	0.40	250.00	100.00
INDIRECT STAFF	0.40		100.00
Total	102.50		\$46,469.00

PERKINScoie

INVOICE #: 6267623

M & F Western Products

064984.7008 / Robert Berg (Cross Design) Copyright Complaint

TOTAL DUE THIS INVOICE

\$46,514.00

REDACTED

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Phone: 206.359.8000

Email: clientacct@perkinscoie.com
Accounting: 206.359.3143
Fax: 206.359.9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

Invoice No.	6282529
Matter No.	064984.7008
Bill Date	October 31, 2020
Due Date	Due Upon Receipt

INVOICE SUMMARY

Re: 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

For Professional Services rendered through September 30, 2020

Services	\$28,263.00
Total Invoice Amount	\$28,263.00

REDACTED

REDACTED

Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

Invoice No. 6282529
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Professional Services through 09/30/2020

Date	Attorney / Assistant	Description of Service	Hours
08/13/2020	J. Hardin	Review, revise, and comment on Motion for Summary Judgment; draft and revise disclosures;	1.50
08/20/2020	J. Hardin	Work session on deposition in Vietnam and response to R. Liebowitz's discovery actions;	1.00
08/21/2020	J. Hardin	Work session on final discovery requests;	0.30
09/01/2020	J. Jennison	Confer with team regarding deposition of Berg;	0.20
09/01/2020	K. Larson	Conference regarding filing Amended Declaration of C. Gist; review prior declaration and update due to errata; drafting pleading to be filed in connection with same; conference regarding Berg deposition and strategy regarding potential motion to compel;	2.30
09/01/2020	J. Hardin	Review and respond to internal correspondence related to discovery issues;	0.30
09/02/2020	J. Jennison	Respond to email from K. Larson regarding errata to Gist declaration;	0.10
09/02/2020	K. Larson	Conference regarding filing of amended Declaration of C. Gist in support of Motion for Partial Summary Judgment; research regarding conducting deposition of R. Berg in Viet Nam and regarding Letters Rogatory;	1.60
09/03/2020	J. Jennison	Review draft email to Liebowitz and respond (.1); review email from R. Liebowitz and strategize regarding letters rogatory process (.2);	0.30
09/03/2020	K. Larson	Conference regarding deposition of Berg; draft email to R. Liebowitz regarding same;	0.40
09/03/2020	J. Hardin	Correspondence with R. Liebowitz regarding Plaintiff's deposition (.4); work session with K. Larson on Vietnamese Letters Rogatory (.3);	0.70
09/04/2020	J. Vana	Review response to sanctions motion; review and revise reply brief in support of same;	0.40
09/04/2020	J. Jennison	Review draft reply brief;	0.10
09/04/2020	K. Larson	Assess Liebowitz response to Rule 11 Motion for Sanctions; conference regarding same; draft Reply and conduct legal research in support of same; telephone conference with P. Eddins regarding Reply [R11 time 4.0 hr]; conference regarding potential motion regarding Berg's failure to comply with discovery order; conference regarding Berg deposition and M&F depositions;	5.60 ← 4.0
09/04/2020	J. Hardin	Work session (including with K. Larson) responding to R. Liebowitz on Plaintiff's deposition (.8); review and comment on R. Liebowitz's response to our Motion for Sanctions (1.0);	1.80
09/09/2020	T. Brandon	Review outstanding motion deadlines and submit portfolio updates to team;	0.10
09/09/2020	K. Larson	Conference regarding depositions of Berg and M&F Western witnesses; conference regarding correspondence to R. Liebowitz regarding same;	0.50

Invoice No. 6282529
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
09/09/2020	K. Larson	Assess Berg response to Motion for Summary Judgment (Cross Designs); conference regarding same; research in support of reply brief; begin drafting reply brief; telephone conference with P. Eddins regarding reply	6.50
09/09/2020	J. Hardin	Review Response in Opposition to Defendant's Motion for Partial Summary Judgment, analyze points for Reply, and discuss same with K. Larson (1.4); prepare for and attend telephone conference with R. Liebowitz (.3); correspondence to R. Liebowitz regarding today's call (.2);	1.90
09/10/2020	D. Howerton	Cite check Reply in Support of Motion for Partial Summary Judgment; consider and respond to email correspondence regarding same;	1.00
09/10/2020	J. Vana	Review motion to compel discovery depositions;	0.20
09/10/2020	K. Larson	Continue drafting Reply In Support of Motion for Partial Summary Judgment (Cross Designs); conference regarding same;	1.00
09/10/2020	K. Larson	Assess Berg's Motion to Compel depositions; conference regarding same; correspond with P. Eddins regarding same; conference with H. Weaver regarding depositions; further conference with team regarding same;	2.20
09/10/2020	J. Hardin	Strategy session with K. Larson; initial review of Reply in Support of Motion for Partial Summary Judgment;	0.60
09/11/2020	K. Larson	Begin drafting response to Berg's Motion to Compel; conference regarding same;	4.40
09/11/2020	J. Hardin	Review draft Reply;	0.50
09/14/2020	J. Jennison	Review opposition to summary judgment motion (.2); review and revise draft reply (.7);	0.90
09/14/2020	K. Larson	Revise Reply In Support of Motion for Partial Summary Judgment (Cross Designs); conference regarding same; legal research in support of same; correspond with P. Eddins regarding same;	4.00
09/14/2020	J. Hardin	Review / strategize on Reply in Support of Motion for Summary Judgment (.4); work session with K. Larson on Motion to Compel (.3);	0.70
09/15/2020	J. Jennison	Respond to questions and comments from K. Larson regarding SJ reply;	0.30
09/15/2020	K. Larson	Conference regarding response to Motion to Compel;	0.20
09/15/2020	K. Larson	Revise Reply In Support of Motion for Partial Summary Judgment (Cross Designs); conference regarding same;	1.10
09/15/2020	J. Hardin	Work session finalizing Reply (.5); review Motion to Compel (.4);	0.90
09/16/2020	K. Larson	Revise Reply In Support of Motion for Partial Summary Judgment (Cross Designs); conference regarding same; correspond with P. Eddins regarding same;	1.00
09/16/2020	J. Hardin	Work session with K. Larson on Motion to Compel Response;	0.30

Invoice No. 6282529
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
09/17/2020	K. Larson	Revise Response to Motion to Compel; conference regarding same;	1.50
09/17/2020	J. Hardin	Correspondence and telephone conference with client regarding settlement demand by Plaintiff (.2); telephone conference with client regarding same (.3); review and revise Response to Motion to Compel (.8);	1.30
09/18/2020	K. Larson	Revise response in opposition to Berg's Motion to Compel; conference regarding same;	1.80
09/18/2020	J. Hardin	Work session with K. Larson to finalize Motion to Compel;	0.40
09/21/2020	J. Vana	Review response to plaintiff's motion to compel;	0.40
09/21/2020	J. Jennison	Review and revise opposition to motion to compel;	0.50
09/21/2020	K. Larson	Revise response in opposition to Berg's Motion to Compel; conference regarding same; telephone conference with P. Eddins regarding same;	1.40
09/22/2020	K. Larson	Revise response in opposition to Berg's Motion to Compel; conference regarding same;	1.00
09/28/2020	K. Larson	Conference regarding pretrial disclosures requirements;	0.30
09/28/2020	J. Hardin	Correspondence regarding next steps;	0.10
09/30/2020	J. Vana	Review reply in support of motion to compel discovery depositions;	0.30
09/30/2020	K. Larson	Assess Berg's Reply in support of Motion to Compel; conference regarding same; correspond with P. Eddins regarding same;	0.60
09/30/2020	J. Hardin	Analyze Plaintiff's Reply in Support of Motion to Compel; correspondence to group regarding same;	0.20
Total			54.70

Invoice No. 6282529
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Services
\$28,263.00

Summary of Services through 09/30/2020

Attorney / Assistant	Billed Hours	Billed Rate	Billed Amount
J. Jennison	2.40	885.00	2,124.00
J. Hardin	12.50	840.00	10,500.00
J. Vana	1.30	675.00	877.50
Partner	16.20		13,501.50
K. Larson	37.40	385.00	14,399.00
Associate	37.40		14,399.00
D. Howerton	1.00	340.00	340.00
T. Brandon	0.10	225.00	22.50
Paralegal	1.10		362.50
Total Services	54.70		\$28,263.00

Total Invoice Amount
\$28,263.00

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Phone: 206.359.8000

Email: clientacct@perkinscoie.com
Accounting: 206.359.3143
Fax: 206.359.9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

Invoice No.	6288646
Matter No.	064984.7008
Bill Date	November 15, 2020
Due Date	Due Upon Receipt

INVOICE SUMMARY

Re: 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

For Professional Services rendered through October 31, 2020

Services	\$39,201.00
Total Invoice Amount	\$39,201.00

REDACTED

REDACTED

Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

Invoice No. 6288646
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Professional Services through 10/31/2020

Date	Attorney / Assistant	Description of Service	Hours
10/06/2020	T. Brandon	Review outstanding USDC deadlines regarding pretrial disclosures and submit portfolio updates to team;	0.10
10/07/2020	T. Brandon	Confer with K. Larson regarding pretrial disclosures;	0.10
10/07/2020	K. Larson	Assess Berg's Motion to Compel depositions; conference regarding same; correspond with P. Eddins regarding same;	0.90
10/07/2020	J. Hardin	Telephone conference with K. Larson regarding next steps and trial exhibits;	0.40
10/08/2020	J. Vana	Analyze discovery affidavit from R. Berg;	0.20
10/08/2020	T. Brandon	Research filing deadlines for upcoming pretrial disclosures filing; confer with K. Larson regarding same;	0.20
10/08/2020	J. Jennison	Emails with team regarding strategy in response to Berg certification (.1);	0.10
10/08/2020	K. Larson	Assess Berg's Declaration regarding efforts to locate and produce documents; conference regarding same; telephone conference with P. Eddins regarding same; revise Pretrial Disclosures and review documents for potential exhibits;	3.10 2.0
10/09/2020	J. Vana	Review summary of Berg/third party communications related to discovery motions;	0.20
10/09/2020	T. Brandon	Review document productions in preparation for pre-trial disclosures; confer with team regarding same;	1.40
10/09/2020	K. Larson	Conference regarding Sur-Reply regarding spoliation of evidence by Berg; conference regarding trial exhibits;	0.70 0.30
10/09/2020	J. Hardin	Planning with K. Larson regarding trial disclosures;	0.30
10/10/2020	K. Larson	Revise Pretrial Disclosures; conference regarding same;	0.60
10/12/2020	T. Brandon	Confer with K. Larson on strategy for filing sur-reply and pretrial disclosures;	0.10
10/12/2020	K. Larson	Conference regarding Pretrial Disclosures; update same; correspond with P. Eddins regarding same; draft Notice of Insufficiency regarding Berg's Declaration;	3.70 0.70
10/12/2020	J. Hardin	Work session on trial disclosures;	0.50
10/13/2020	J. Vana	Review pretrial disclosures;	0.20
10/13/2020	T. Brandon	Continue review/organization of documents for pretrial disclosures/additional document production and surrounding deadlines; serve supplemental document production; serve Pretrial Disclosures; file Notice of Disclosure of Pretrial Disclosures; confer with K. Larson regarding same;	4.60 4.0

Invoice No. 6288646
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
10/13/2020	J. Jennison	Review draft sur-reply (.2); email J. Hardin and K. Larson regarding same (.2); respond to K. Larson regarding same (.2);	0.60
10/13/2020	K. Larson	Update Pretrial Disclosures; conference regarding exhibits in regarding same; correspond with P. Eddins regarding same; correspond with P. Eddins regarding response to Berg's late-filed declaration; revise response; conference regarding same;	5.20
			1.0
10/13/2020	J. Hardin	Finalize Sur-Reply (1.2); telephone conference with K. Larson regarding same (.3);	1.50
10/14/2020	J. Jennison	Confer with K. Larson and J. Hardin regarding motion to strike (.1);	0.10
10/14/2020	K. Larson	Review pretrial disclosures from Berg; legal research regarding potential sanctions motion in response to same; conference regarding same;	1.50
10/15/2020	K. Larson	Conference regarding response to Berg's insufficient pretrial disclosures;	0.50
10/15/2020	J. Hardin	Analysis related to striking Plaintiff's pre-trial disclosures;	0.30
10/16/2020	J. Vana	Review pretrial disclosures;	0.30
10/16/2020	K. Larson	Correspond with P. Eddins regarding Motion to Strike; begin drafting same;	0.30
10/19/2020	K. Larson	Draft Motion to Strike Pretrial Disclosures; conference regarding same; research in support of same;	1.00
10/20/2020	T. Brandon	Finalize/file Motion to Strike and supporting documents; confer with K. Larson regarding same;	1.50
10/20/2020	K. Larson	Revise Motion to Strike Pretrial Disclosures; conference regarding same;	0.50
10/20/2020	J. Hardin	Edit Motion to Strike and comment on same;	0.50
10/22/2020	J. Vana	Review court order regarding discovery depositions;	0.30
10/22/2020	J. Jennison	Review order on motion to compel and confer with team;	0.30
10/22/2020	K. Larson	Assess Court's Order regarding Plaintiff's Motion to Compel; conference regarding same;	1.30
10/22/2020	J. Hardin	Review and comment on Court's Order related to Motion to Compel;	0.30
10/23/2020	J. Jennison	Confer with team regarding Berg deposition (.2); call with J. Hardin and K. Larson regarding deposition (.7);	0.90
10/23/2020	K. Larson	Research regarding deposing Berg in Vietnam and potential issues with international law; conference regarding strategy regarding same;	2.90
10/23/2020	J. Hardin	Telephone conference with P. Eddins on Court's Order (.3); work session with internal group on next steps given Court's Order (.5);	0.80
10/26/2020	T. Brandon	Review outstanding deposition dates and submit portfolio updates to team;	0.10

Invoice No. 6288646
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
10/26/2020	J. Jennison	Review email to counsel in Vietnam (.1);	0.10
10/26/2020	K. Larson	Correspond with counsel in Viet Nam regarding options for deposition of R. Berg; conference regarding possible protective order; correspond with P. Eddins regarding depositions of M&F Western witnesses;	0.90
10/27/2020	T. Brandon	Organize/build deposition prep materials; confer with K. Larson regarding same;	1.60
10/27/2020	J. Jennison	Review correspondence with international lawyers (.1); email team regarding strategy (.1); confer with team regarding protective order strategy (.1);	0.30
10/27/2020	K. Larson	Legal research in support of Motion for Protective Order and Motion to Obtain Berg's Compliance with Deposition; conference regarding same; telephone conference with counsel regarding Vietnam law and procedures for obtaining deposition through letters rogatory process; begin drafting Motion; conference with P. Eddins regarding deposition preparation; correspond with H. Weaver regarding deposition; conference regarding deposition preparation materials for M&F Western witnesses;	10.00
10/27/2020	J. Hardin	Work session on deposition requests (.3); analysis of deposition prep material (.3); attend telephone conference and work session with K. Larson on Motion for Protective Order (.8);	1.40
10/28/2020	J. Vana	Review motion to show cause;	0.30
10/28/2020	T. Brandon	Research rules regarding emergency motions; finalize/file emergency motion and motion for order to show cause and related supporting documents; confer with K. Larson regarding same;	2.90
10/28/2020	J. Jennison	Call with K. Larson regarding emergency motion (.2); revise emergency motion (.5);	0.70
10/28/2020	K. Larson	Continue drafting Emergency Motion for Protective Order; conference regarding same; draft Motion for an Order to Show Cause and conduct related legal research in support of same; telephone conference with R. Liebowitz regarding meet and confer pertaining to both motions; telephone conference with P. Eddins regarding settlement offer from Berg and strategy regarding motions and depositions;	10.40
10/28/2020	J. Hardin	Revise and finalize Emergency Motion for a Protective Order and Motion Seeking the Court's Guidance Regarding Deposition of Plaintiff;	3.00
10/28/2020	R. Hradecky	Secondary resource research per K Larson	1.20
10/29/2020	J. Vana	Internal conference regarding discovery and settlement strategy; review discovery order;	0.40
10/29/2020	T. Brandon	Continue researching deposition preparation materials; confer with K. Larson regarding same;	1.20
10/29/2020	J. Jennison	Review Judge Kernodle's order on emergency motion (.1); confer with team regarding same (.1);	0.20

Invoice No. 6288646
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
10/29/2020	K. Larson	Conference regarding Court's Order regarding M&F Western depositions; correspond with P. Eddins regarding same; correspond with R. Liebowitz regarding depositions; review depositions materials relating to P. Eddins deposition;	3.00
10/29/2020	J. Hardin	Prepare for potential hearing (1.2); review Order and work session with K. Larson on same and deposition preparation (.7);	1.90
10/30/2020	J. Vana	Review response to emergency discovery motion;	0.20
10/30/2020	T. Brandon	Continue to research/organize witness deposition preparation documents; research judge information in preparation for depositions; confer with team regarding same;	4.00
10/30/2020	J. Jennison	Review plaintiff's filing and draft response (.2);	0.20
10/30/2020	K. Larson	Conference regarding Berg's response to Emergency Motion; revise reply; legal research in support of same; conduct deposition preparation session with M. Eddins; correspond with R. Liebowitz regarding depositions; correspond with P. Eddins regarding M. Eddins deposition; conference with ESS team regarding remote deposition best practices;	5.70
10/30/2020	J. Hardin	Analysis of Response; prepare and file Reply;	1.20
Total			88.90

Services
\$39,201.00

Summary of Services through 10/31/2020

Attorney / Assistant	Billed Hours	Billed Rate	Billed Amount
J. Jennison	3.50	885.00	3,097.50
J. Hardin	12.10	840.00	10,164.00
J. Vana	2.10	675.00	1,417.50
Partner	17.70		14,679.00
K. Larson	52.20	385.00	20,097.00
Associate	52.20		20,097.00
T. Brandon	17.80	225.00	4,005.00
Paralegal	17.80		4,005.00
R. Hradecky	1.20	350.00	420.00
Indirect Staff	1.20		420.00
Total Services	88.90		\$39,201.00

Invoice No. 6288646
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Total Invoice Amount
\$39,201.00

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Phone: 206.359.8000

Email: clientacct@perkinscoie.com
Accounting: 206.359.3143
Fax: 206.359.9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

Invoice No.	6305080
Matter No.	064984.7008
Bill Date	December 10, 2020
Due Date	Due Upon Receipt

INVOICE SUMMARY

Re: 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

For Professional Services rendered through November 30, 2020

Services	\$106,689.25
Less Reduction of Services	(\$8,689.25)
Total Services	<hr/> \$98,000.00
Disbursements and Other Services	\$166.00
Total Invoice Amount	<hr/> \$98,166.00

REDACTED

REDACTED

Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Professional Services through 11/30/2020

Date	Attorney / Assistant	Description of Service	Hours
10/08/2020	J. Hardin	Review Plaintiff's Declaration and analysis of same (.3); review Affidavit and comment to team regarding same (.3);	0.60
11/01/2020	K. Larson	Revise Motion to Strike Pretrial Disclosures;	1.05
11/02/2020	T. Brandon	Review/organize witness prep materials for H. Weaver/C. Kraft/P. Eddins; confer with K. Larson/P/ Eddins regarding same;	2.40
11/02/2020	J. Jennison	Review email from K. Larson regarding court's ruling (.1); call with K. Larson and J. Hardin regarding depositions (.5);	0.60
11/02/2020	K. Larson	Conference regarding M&F Western depositions; conference with P. Eddins regarding deposition preparation; conference regarding deposition prep materials for H. Weaver; telephone conference with H. Weaver regarding upcoming deposition and preparation session; conference regarding request for extension of time to file supplemental response to Motion for Summary Judgment; correspond with R. Liebowitz regarding deposition logistics;	7.50
11/02/2020	J. Hardin	Work session with K. Larsen regarding deposition prep;	0.70
11/03/2020	T. Brandon	Review document production/prepare index; review witness deposition prep folders; confer with K. Larson regarding same; confer with team regarding logistics for H. Weaver prep binder;	4.00
11/03/2020	J. Jennison	Respond to draft email from J. Hardin regarding extension (.1); review and respond to email about C. Kraft deposition (.1); respond to email about J. Lashelle deposition prep (.1);	0.30
11/03/2020	K. Larson	Conference with C. Kraft regarding deposition preparation; conference with J. LaShelle regarding deposition preparation; telephone conference with P. Eddins regarding deposition preparation; conference regarding response to Berg's request for an extension of time regarding deadline to file supplement regarding summary judgment motion; conference regarding deposition preparation materials for H. Weaver;	6.90
11/03/2020	J. Hardin	Review request for extension and respond to same; work session on deposition prep and deposition schedule;	0.40
11/04/2020	J. Vana	Internal conference regarding expert testimony issues;	0.30
11/04/2020	T. Brandon	Confer with S. Coren regarding H. Weaver deposition materials; confer with K. Larson on upcoming trial schedule and back up;	0.90
11/04/2020	J. Jennison	Review email from K. Larson (.1); strategize about REDACTED H. Weaver REDACTED (.1); call with K. Larson and J. Hardin regarding depositions and strategy (.8);	1.00
11/04/2020	K. Larson	Conference regarding H. Weaver deposition; defend deposition of P. Eddins; conference regarding same and regarding C. Kraft deposition; telephone conference with C. Kraft regarding deposition preparation; conference regarding upcoming pretrial planning; assess Berg's Response	11.20

0.20

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
		to Motion for an Order to Show Cause;	
11/04/2020	J. Hardin	Telephone conference with team regarding depositions;	0.60
11/05/2020	T. Brandon	Confer with J. LaShelle/K. Larson regarding deposition prep; review C Kraft declaration and exhibits; confer with team regarding same;	0.80
11/05/2020	K. Larson	Prepare for defense of C. Kraft deposition; defend C. Kraft deposition; telephone conference with same; telephone conference with P. Eddins regarding depositions and case strategy; conference with J. LaShelle regarding deposition preparation;	6.00
11/05/2020	J. Hardin	Review trial planning;	0.20
11/06/2020	T. Brandon	Confer with team regarding documents for H. Weaver deposition prep;	0.10
11/06/2020	J. Jennison	Call with K. Larson and J. Hardin regarding trial preparation (.5); email J. Vana regarding budget (.1);	0.60
11/06/2020	K. Larson	Conference regarding H. Weaver deposition and pretrial preparation; defend deposition of J. LaShelle; conference with same regarding same; conference with P. Eddins regarding same;	5.40
11/06/2020	J. Hardin	Work session on pre-trial deadlines (.6); work session on depositions and H. Weaver's position (.5);	1.10
11/07/2020	K. Larson	Conference regarding J. LaShelle deposition;	0.50
11/08/2020	J. Jennison	Review summary of J. LaShelle's deposition (.1); review and respond to email about Ballinger contact information (.1); review email from P. Eddins and K. Larson response (.1);	0.30
11/08/2020	K. Larson	Correspond with P. Eddins regarding Berg's response to Motion for an Order to Show Cause; conference regarding H. Weaver deposition and potential withdrawal from case; draft correspondence to R. Liebowitz regarding H. Weaver deposition and G. Ballinger contact;	0.80
11/09/2020	J. Vana	Internal conference regarding discovery and summary judgment strategy;	0.40
11/09/2020	J. Jennison	Respond to email from K. Larson about H. Weaver status and email to Liebowitz (.1); revise draft submission and email K. Larson and J. Hardin regarding same (.1);	0.20
11/09/2020	K. Larson	Correspond with R. Liebowitz regarding withdrawal of H. Weaver and production of G. Ballinger contact information; draft Notice to Court regarding withdrawal of H. Weaver; conference regarding same; correspond with P. Eddins regarding same;	5.50
11/09/2020	G. Gargiulo	Retrieve dockets and filings for K. Larson;	0.30
11/09/2020	J. Hardin	Draft Reply in Support of Motion to Show Cause (2.0); review trial planning (.2);	2.20
11/10/2020	T. Brandon	Review docket regarding Reply to Motion for Sanctions deadline,	0.30

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
		discovery deadlines; confer with K. Larson regarding same;	
11/10/2020	J. Jennison	Review reply in support of motion for an order to show cause (.3);	0.30
11/10/2020	K. Larson	Correspond with P. Eddins regarding Berg's response to Motion for an Order to Show Cause; revise Reply in support of same; legal research in support of same; conference regarding Berg's late-submitted interrogatory responses;	2.50
11/10/2020	K. Smith	Cite-check reply;	1.00
11/10/2020	J. Hardin	Review revised Disclosures and analysis of next steps;	0.40
11/11/2020	T. Brandon	Review exhibits for Motion to Show Cause; prepare/file Appendix for Reply to Motion to Show Cause; confer with K. Larson regarding same;	0.90
11/11/2020	J. Jennison	Respond to emails regarding motion in limine REDACTED (.2);	0.20
11/11/2020	K. Larson	Conference regarding Berg's late-submitted interrogatory responses; research regarding motion to strike same; finalize Reply ISO Motion to Show Cause for filing; conference regarding same;	3.00
11/11/2020	J. Hardin	Review Reply in Support of Motion to Show Cause and work session with K. Larson regarding same;	0.20
11/11/2020	J. Walker	Locate Texas pretrial orders and jury instructions for K. Larson;	2.20
11/12/2020	J. Vana	Review Berg's revised interrogatory answers;	0.20
11/12/2020	T. Brandon	Review/edit pretrial action items; review/docket deadlines in order on Motion to Strike Expert Weaver;	0.20
11/12/2020	K. Larson	Conference regarding upcoming pretrial deadlines; draft joint filing regarding Settlement Conference; telephone conference with P. Eddins regarding Berg's late-filed Interrogatory Answers and related strategy; draft correspondence to R. Liebowitz;	0.70 1.30
11/13/2020	T. Brandon	Review/download Berg document production; prepare draft exhibits list; research local rules on service of same; confer with team regarding same;	1.0 1.30
11/13/2020	J. Jennison	Respond to email from K. Larson regarding Berg Rog Responses (.1);	0.10
11/13/2020	K. Larson	Begin drafting Motions in Limine; conference regarding same; correspond with R. Liebowitz regarding pretrial disclosures; draft correspondence regarding settlement conference; conference regarding trial exhibits;	6.20
11/13/2020	J. Hardin	Work session with K. Larson on trial preparation (.3); analysis of issues related to additional document production (.4);	0.70
11/13/2020	K. Kimura	Research cases regarding certified copies of copyright registrations for K. Larson;	0.80
11/14/2020	K. Larson	Begin drafting Motions in Limine; conduct research in support of same;	5.30

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
11/16/2020	V. Barei	Conference with T. Brandon regarding case coverage needs;	0.60
11/16/2020	T. Brandon	Confer with team/serve pretrial disclosures objections; confer with K. Larson regarding exhibit numbering and research same;	1.60
11/16/2020	J. Jennison	Review K. Larson draft response to R. Liebowitz (.1); revise draft (.1); revise draft motions in limine (.6); respond to K. Larson summary of meet and confer (.2); read Berg opposition to motion to strike Weaver (.1);	1.10
11/16/2020	K. Larson	Revise Motions in Limine; conference regarding same; telephone conference with opposing counsel regarding objections to pretrial disclosures; draft same; correspond with opposing counsel regarding requested extensions of pretrial deadlines; conference regarding trial exhibits;	5.10
11/16/2020	R. Haney	Telephone conference with K. Larson regarding requested research and case background; review summary judgment filings in preparation for research regarding motions in limine;	0.70
11/16/2020	J. Hardin	Work session on Plaintiff's request for extensions;	0.40
11/17/2020	T. Brandon	Confer with court regarding exhibit list preferences; confer with team regarding exhibits list, objections to pretrial disclosures; continue to revise exhibit list;	4.10
11/17/2020	J. Jennison	Review court order striking Weaver report (.1); review email from K. Larson regarding settlement (.1);	0.20
11/17/2020	K. Larson	Begin drafting pretrial order; revise motions in limine; conference regarding same; draft witness list; assess Berg's Supplemental Response to Motion for Summary Judgment; correspond with P. Eddins regarding same; conference regarding trial exhibits and production of Symons case documents;	8.60 7.0
11/17/2020	R. Haney	Research regarding excluding new legal theories after close of discovery, cases addressing introducing blurry images in support of infringement claims, cases regarding application of "widely disseminated" analysis in the Fifth Circuit and exclusion of argument regarding same, and excluding improper and unreliable expert testimony; draft jury instructions;	4.50
11/17/2020	J. Hardin	Work session with K. Larson regarding upcoming pre-trial filings;	0.70
11/17/2020	J. Walker	Locate jury instructions for jewelry cases for K. Larson;	1.60
11/18/2020	J. Vana	Review supplemental discovery responses; internal conference regarding same;	0.40
11/18/2020	T. Brandon	Continue to finalize Exhibit List; confer with K. Larson regarding same;	0.60
11/18/2020	J. Jennison	Review K. Larson summary of Berg opposition to MSJ (.1);	0.10
11/18/2020	K. Larson	Conference regarding Motions in Limine; conference regarding supplemental response to Motion for Summary Judgment regarding Cross Designs; begin drafting reply in support of same; conference with P. Eddins	4.80

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
		regarding same; participate in settlement conference; further conference regarding same; conference regarding exhibit list; begin drafting jury verdict form;	2.40
11/18/2020	R. Haney	Telephone conference with K. Larson to discuss motion in limine research REDACTED conduct research regarding same;	0.80
11/18/2020	J. Hardin	Review Exhibit List and Pre-Trial Order (.4); prepare for and attend settlement conference (.4); work session with K. Larson on pre-trial deadlines and filings (.4);	1.20
11/19/2020	T. Brandon	Confer with team regarding deposition transcripts; confer with court reporter regarding exhibits; review/organize same;	1.90
11/19/2020	J. Jennison	Review summary of settlement conference (.1); review Berg supplemental opposition and declarations (.2);	0.30
11/19/2020	K. Larson	Revise Motions in Limine; conference regarding same; continue drafting supplemental reply in support of Cross Motion for Summary Judgment; research in support of same;	4.0 10.40
11/19/2020	R. Haney	Research regarding international law implications for taking evidence abroad, late produced evidence regarding Berg v. Symons case, and willful infringement; draft motions in limine regarding same; revise jury instructions regarding instructions on copying, willful infringement, and spoliation;	8.20
11/19/2020	J. Hardin	Update internal team on settlement conference (.2); review Reply in Support of Motion to Show Cause and work session with K. Larson regarding same (.2);	0.40
11/20/2020	V. Barei	Conference with Kirstin Larson regarding project status; prepare courtesy copy of trial exhibits for delivery to Judge and opposing counsel; communications with legal team;	3.80
11/20/2020	J. Vana	Review supplemental reply in support of partial summary judgment motion;	0.70
11/20/2020	J. Jennison	Review draft pre-trial order (.6); confer with K. Larson regarding status of trial preparation (.1);	0.70
11/20/2020	K. Larson	Revise Motions in Limine; revise Reply in Support of Cross MSJ; conference with P. Eddins regarding same; revise witness list; revise Motion to Strike Superseding Answers and conduct research in support of same; conference regarding exhibits; draft letter to Court regarding same; revise voir dire questions; revise verdict form; conference regarding same;	10.00 7.0
11/20/2020	R. Haney	Revise model jury instructions regarding substantial similarity instruction, willfulness instruction, spoliation, and scene a faire theory; revise and draft proposed verdict form;	3.90
11/20/2020	J. Hardin	Work session with K. Larson coordinating next week's filings;	0.30

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
11/20/2020	D. Kimmons	Compile case law regarding excluding new theory of infringement claims;	1.40
11/20/2020	G. Auslander	Bluebook format citations and shepardize cases, as well as confirm accuracy and format of pincites for Reply in support of Motion for Summary Judgment on Cross Claims;	4.00
11/20/2020	G. Auslander	Start Bluebook format citations and shepardize cases, as well as confirm accuracy and format of pincites for Motions in Limine;	3.50
11/21/2020	K. Larson	Revise Motions in Limine; continue drafting Motion to Strike; conduct legal research in support of same; revise Reply in Support of Motion for Summary Judgment;	2.70 ← .70
11/21/2020	J. Hardin	Review and revise Defendant's Supplemental Reply in Support of its Motion for Partial Summary Judgment;	0.80
11/21/2020	G. Auslander	Continue Bluebook format citations and shepardize cases, as well as confirm accuracy and format of pincites for Motions in Limine;	1.50
11/22/2020	J. Vana	Review and revise motions in limine;	0.70
11/22/2020	J. Jennison	Review emails from J. Hardin and K. Larson regarding pretrial submissions (.1); exchange emails regarding testimony authentication (.1);	0.20
11/22/2020	K. Larson	Revise Motions in Limine; conference regarding same; telephone conference with P. Eddins regarding Reply in Support of Cross MSJ; telephone conference with C. Kraft regarding deposition corrections of errata; conference regarding various pretrial papers and proposed Pretrial Order; revise same;	7.70 ← 6.0
11/22/2020	J. Hardin	Review and revise all pre-trial filings (1.5); review and revise Reply in Support of Motion for Summary Judgment (.5); work session with K. Larson regarding same (.4);	2.40
11/22/2020	G. Auslander	Bluebook format citations and shepardize cases, as well as confirm accuracy and format of pincites for Motion to Strike Interrogatory Answers or in Alternative Motion in Limine;	2.30
11/23/2020	V. Barei	Assist in preparation of appendix of citations; communicate with legal team; transmit production to opposing counsel;	5.40
11/23/2020	J. Vana	Review draft pretrial order;	0.60
11/23/2020	J. Jennison	Review correspondence regarding submission of evidence (.1); review article REDACTED (.1); review draft reply to MSJ (.4); call with K. Larson and J. Hardin regarding pre-trial submissions (.4); review plaintiff's objections to evidence (.3); review deposition excerpts and email K. Larson regarding same (.3); review and revise draft motion to strike (.3); call with K. Larson (.1); revise motion to strike (.6); review Liebowitz revisions to the Pre-trial statement (.3); review draft reply brief (.4); call with K. Larson (.2); revise motions in limine (1.2); draft findings of fact and conclusions of law (3.1); review voir dire questions (.1); exchange emails with team regarding filings (.2);	8.10

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
11/23/2020	K. Larson	Conference regarding Motions in Limine; telephone conference with opposing counsel regarding meet and confer regarding Motions in Limine and Joint Pretrial Order; review and revise proposed order regarding Motions in Limine and Motion to Strike; revise Motion to Strike; draft Larson Declarations in support of Motion to Strike, Motions in Limine and Reply in Support of Motion for Summary Judgment; review exhibits in connection with same; review Plaintiff's propose additions to Pretrial Order; conference regarding same;	14.70 8.0
11/23/2020	R. Haney	Research regarding substantial similarity verses striking similarity theory of proving copying; revise reply in support of motion for summary judgment;	1.40
11/23/2020	J. Hardin	Work session with internal team on pre-trial filings and correspondence from Plaintiff; work session on Motion for Summary Judgment Reply; revise Motions in Limine; review and comment on Findings of Fact and Conclusions of Law;	1.90 1.0
11/24/2020	V. Barei	Draft of email regarding delivery issues for K. Larson review; communicate with opposing counsel regarding delivery issues; communicate with Ricoh regarding delivery issues;	0.60
11/24/2020	J. Jennison	Review list of the day's filings (.1); respond to email from K. Larson regarding Berg motions in limine (.1); revise pretrial order (.7); call with K. Larson regarding pretrial order (.1); review and revise latest draft (.2); confer with J. Hardin and K. Larson regarding pretrial order (.1); attention to finalizing the pretrial order (.2);	1.50
11/24/2020	K. Larson	Finalize Motions in Limine and review and approve documents for filing; finalize Reply in Support of Cross MSJ and review and approve documents for filing; finalize Mtotion to Strike and review and approve documents for filing; telephone conference with P. Eddins regarding filings; correspond with opposing counsel regarding Joint Pretrial Order and related submissions; revise Findings of Fact and Conclusions of Law in support of Joint Pretrial Order; conference regarding same; draft Joint Settlement Report; revise Joint Voir Dire questions; conference regarding trial exhibits;	10.20 5.0
11/24/2020	R. Haney	Revise pretrial motion regarding substantial similarity test;	0.30
11/24/2020	J. Hardin	Work session on pre-trial filings;	2.50
11/25/2020	K. Larson	Correspond with opposing counsel regarding Joint Settlement Statement; conference regarding action items relating to pretrial preparations;	0.90
11/25/2020	J. Hardin	Revise Joint Settlement Report;	0.20
11/30/2020	K. Larson	Conference regarding strategy for response to motions in limine; revise verdict form;	1.70
11/30/2020	J. Hardin	Work session on Motions in Limine and other filings with K. Larson;	0.50
Total			245.35

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINS COIE

Services
\$106,689.25

Less Reduction of Services
(\$8,689.25)

Total Services
\$98,000.00

Summary of Services through 11/30/2020

Attorney / Assistant	Billed Hours	Billed Rate	Billed Amount
J. Jennison	15.80	885.00	13,983.00
J. Hardin	18.40	840.00	15,456.00
J. Vana	3.30	675.00	2,227.50
Partner	37.50		31,666.50
R. Haney	19.80	500.00	9,900.00
K. Larson	139.95	385.00	53,880.75
Associate	159.75		63,780.75
K. Smith	12.30	270.00	3,321.00
T. Brandon	19.10	225.00	4,297.50
V. Barei	10.40	200.00	2,080.00
Paralegal	41.80		9,698.50
J. Walker	6.00	250.00	1,500.00
G. Gargiulo	0.30	145.00	43.50
Indirect Staff	6.30		1,543.50
Total Services	245.35		\$106,689.25

Disbursements and Other Detailed Services through 11/30/2020

Description	Amount
Photocopies and printing	113.40
UPS - Perkins Coie	21.48
UPS - Hugh Weaver, Rm 204	25.13
UPS - UPS	5.99
Total	\$166.00

Total Disbursements and Other Services
\$166.00

Total Invoice Amount
\$98,166.00

Invoice No. 6305080
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

1201 Third Avenue, Suite 4900
Seattle, Washington 98101
Phone: 206.359.8000

Email: clientacct@perkinscoie.com
Accounting: 206.359.3143
Fax: 206.359.9000

PERKINScoie

M & F Western Products
Attn: Paul Eddins
P O Box 208
Sulphur Springs, TX 75483

Invoice No.	6324153
Matter No.	064984.7008
Bill Date	January 20, 2021
Due Date	Due Upon Receipt

INVOICE SUMMARY

Re: 064984.7008 / Robert Berg (Cross Design) Copyright Complaint

For Professional Services rendered through December 31, 2020

Services	\$36,225.50
Disbursements and Other Services	\$218.74
Total Invoice Amount	\$36,444.24

REDACTED

REDACTED

Client Privacy Policy. We collect or receive information in the ordinary course of providing legal services to you, including personal information. For more information about how we collect, use, and disclose personal information in connection with our legal representation of clients, please review our Client Privacy Policy, which can be accessed here: <https://www.perkinscoie.com/en/client-privacy-policy.html>.

After 30 days, a monthly late charge of 1% per month from the invoice date (or such lower rate as required by applicable law) will be due. Should a collection action or proceeding be necessary, attorneys' fees and costs for such collection effort will also be due.

Invoice No. 6324153
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Professional Services through 12/31/2020

Date	Attorney / Assistant	Description of Service	Hours
12/01/2020	J. Jennison	Review article on Liebowitz suspension and email team regarding same (.1);	0.10
12/01/2020	K. Larson	Update verdict form; conference regarding strategy regarding Motion to Strike;	0.20
12/02/2020	K. Larson	Review Berg's proposed jury instructions; conference regarding same; begin drafting Response to Motion to Strike; research in support of same;	4.00
12/02/2020	R. Haney	Revise proposed jury verdict form;	1.80
12/02/2020	J. Hardin	Comment on verdict form;	0.30
12/02/2020	K. Kimura	Search for joint proposed jury instructions REDACTED	0.30
12/03/2020	K. Larson	Revise Response to Motion for Leave to File Amended Pretrial Disclosures; draft objections and counterdesignations to Berg's depositions designations; conference regarding jury instructions;	3.30
12/03/2020	R. Haney	Review plaintiff's proposed jury instructions; draft joint proposed jury instructions;	1.90
12/03/2020	J. Hardin	Revise Response to Motion for Leave;	0.30
12/04/2020	J. Jennison	Review opposition to motion to amend pretrial disclosures (.2); email K. Larson regarding same (.1);	0.30
12/04/2020	K. Larson	Revise Response to Motion for Leave to File Amended Pretrial Disclosures; conference with P. Eddins regarding same; revise objections to deposition designations for service; conference regarding same; conference regarding jury instructions;	1.70
12/04/2020	R. Haney	Draft joint proposed jury instructions;	2.60
12/06/2020	K. Larson	Revise jury instructions; revise Response to Motion for Leave to Amend Pretrial Disclosures;	4.50
12/07/2020	G. Smidt	Cite check response to Berg_s motion for leave to file amended pretrial disclosures;	2.40
12/07/2020	J. Jennison	Call with K. Larson and J. Hardin regarding Liebowitz suspension (.5);	0.50
12/07/2020	K. Larson	Conference regarding Response to Plaintiff's Motion for Leave to File Amended Pretrial Disclosures; revise same; revise jury instructions and verdict form; research in connection with same; conference regarding same;	3.20
12/07/2020	R. Haney	Revise proposed jury instructions; draft summary to opposing counsel regarding same;	2.70
12/07/2020	A. Perkins	Research jury instructions about spoliation for K. Larson;	1.30

Invoice No. 6324153
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
12/07/2020	J. Hardin	Internal working session on Response to Amended Disclosures;	0.50
12/08/2020	T. Brandon	Confer with team regarding objections to jury instructions deadline; research/prepare Appendices for Response to Motion for Leave to Amend;	0.50
12/08/2020	J. Jennison	Review opposition to motion to amend pretrial disclosures (.4); revise verdict form (.4); review proposed jury charge (.6); respond to email regarding verdict form (.1);	1.50
12/08/2020	K. Larson	Conference regarding Response to Plaintiff's Motion for Leave to File Amended Pretrial Disclosures; revise same; revise jury instructions and verdict form; research in connection with same; conference regarding same; correspond with opposing counsel regarding same; assess Berg's opposition to M&F Western's Motion to Strike Superseding Interrogatories and correspond with P. Eddins regarding same;	7.80
12/08/2020	R. Haney	Revise joint proposed jury instructions; draft email to opposing counsel regarding same;	1.00
12/08/2020	J. Hardin	Review comments and current filings and analyze same (.4); strategy session with K. Larson on trial filings (.5);	0.90
12/09/2020	T. Brandon	Finalize Appendix in Support of Response to Motion for Leave; confer with K. Larson regarding same;	0.30
12/09/2020	K. Larson	Conference with P. Eddins regarding Response to Plaintiff's Motion for Leave to File Amended Pretrial Disclosures; revise same; draft Reply in support of Motion to Strike Superseding Interrogatory Answers; conference regarding same; legal research in support of same;	4.20
12/09/2020	J. Hardin	Reply in Support of Motion to Strike Amended Disclosures;	0.80
12/10/2020	J. Vana	Review and revise Reply in Support of Motion to Strike; internal conference regarding same;	0.60
12/10/2020	T. Brandon	Review deposition corrections; confer/serve on R. Liebowitz and court reporter;	0.20
12/10/2020	K. Larson	Revise Reply in Support of Motion to Strike Superseding Interrogatory Answers; conference regarding same; conference regarding deposition corrections and upcoming meet and confer regarding jury charge;	1.90
12/10/2020	G. Auslander	Bluebook format legal citations and confirm pincites, as well as Shepardize cases, for Reply in support of Motion to Strike Plaintiff's Superseding Answers and Plaintiff's Declaration;	2.80
12/11/2020	T. Brandon	Review Reply in Support of Motion to Strike;	0.80
12/11/2020	K. Larson	Finalize Reply in Support of Motion to Strike Superseding Interrogatory Answers; telephone conference with P. Eddins regarding same; correspond with R. Liebowitz regarding meet and confer regarding jury instructions;	1.20
12/11/2020	J. Hardin	Work session on conference related to jury charge;	0.30

Invoice No. 6324153
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
12/15/2020	J. Jennison	Confer with team regarding affirmative defenses (.1);	0.10
12/15/2020	K. Larson	Prepare for and participate in meet-and-confer regarding jury instructions;	0.80
12/15/2020	J. Hardin	Prepare for and attend conference on jury charge as ordered by the Court;	1.50
12/17/2020	K. Larson	Begin drafting responses to Berg's motions in limine; assess Berg's Reply in support of Motion to Amend Pretrial Disclosures; correspond with P. Eddins regarding same and trial preparation;	1.30
12/18/2020	K. Larson	Continue drafting response to Berg's Motions in Limine; draft response and objections to proposed joint jury instructions from Berg;	1.50
12/21/2020	T. Brandon	Prepare exhibits for motions in limine; confer with K. Larson regarding same;	1.00
12/21/2020	J. Jennison	Review article about fair use loss for Liebowitz (.1); revise jury charge (.7);	0.80
12/21/2020	K. Larson	Revise responses to motions in limine; conference regarding exhibits in support of same; research regarding same;	0.80
12/21/2020	J. Hardin	Review and comment on Response to Berg's Motions in Limine and Berg's proposed revisions to Jury Charge;	0.40
12/22/2020	J. Vana	Review plaintiff's motions in limine and draft response;	0.40
12/22/2020	T. Brandon	Research potential 3rd party infringers claimed by Berg; confer with K. Larson regarding same;	0.40
12/22/2020	K. Larson	Finalize Response to Motions in Limine for filing; correspond with P. Eddins regarding same; correspond with opposing counsel regarding joint jury charge; revise proposed jury instructions per further input from opposing counsel; conference regarding same;	4.30
12/22/2020	J. Hardin	Finalize jury charge with K. Larson;	0.60
12/28/2020	T. Brandon	Review offer of judgment/trial deadlines; consider trial preparation; confer with K. Larson regarding same;	3.50
12/28/2020	K. Larson	Conference regarding trial preparation tasks; research regarding offers of judgment; evaluate Berg's responses to M&F Western's motions in limine and conduct legal research regarding same; conference regarding trial strategy in light of same;	2.50
12/29/2020	J. Vana	Review favorable summary judgment opinion; conference with P. Eddins regarding same;	0.70
12/29/2020	K. Larson	Review Court's ruling regarding summary judgment motion; conference regarding motion for fees and costs; conference with P. Eddins regarding court's ruling;	0.50
12/29/2020	J. Hardin	Review Order granting summary judgment; work session with K. Larson regarding same;	0.80

Invoice No. 6324153
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Date	Attorney / Assistant	Description of Service	Hours
12/30/2020	J. Vana	REDACTED review court order regarding scheduling conference for outstanding motions;	0.40
12/30/2020	K. Neu	Search for Eastern District of Texas motions regarding recovering fees (K. Larson);	1.70
12/30/2020	T. Brandon	Confer with P. Eddins and team regarding Order setting Status Conference;	0.10
12/30/2020	J. Jennison	Review summary judgment order (.2);	0.20
12/31/2020	J. Vana	Additional review of summary judgment opinion; analyze strategy for pursuing sanctions and fees;	0.60
Total			81.60

Services
\$36,225.50

Summary of Services through 12/31/2020

Attorney / Assistant	Billed Hours	Billed Rate	Billed Amount
J. Jennison	3.50	885.00	3,097.50
J. Hardin	6.40	840.00	5,376.00
J. Vana	2.70	675.00	1,822.50
Partner	12.60		10,296.00
R. Haney	10.00	500.00	5,000.00
K. Larson	43.70	385.00	16,824.50
Associate	53.70		21,824.50
G. Smidt	2.40	360.00	864.00
G. Auslander	2.80	270.00	756.00
T. Brandon	6.80	225.00	1,530.00
Paralegal	12.00		3,150.00
A. Perkins	1.30	350.00	455.00
K. Kimura	2.00	250.00	500.00
Indirect Staff	3.30		955.00
Total Services	81.60		\$36,225.50

Invoice No. 6324153
M & F Western Products
064984.7008 / Robert Berg (Cross Design) Copyright Complaint

PERKINScoie

Disbursements and Other Detailed Services through 12/31/2020

Description	Amount
Staff overtime assistance	105.00
UPS - UPS	16.20
UPS - UPS	17.00
UPS - LIEBOWITZ LAW FIRM, PLLC	32.36
UPS - WILLIAM M STEGER FEDERAL BUILD	(17.33)
UPS - UPS	16.20
UPS - WILLIAM M STEGER FEDERAL BUILD	49.31
Total	\$218.74

Total Disbursements and Other Services
\$218.74

Total Invoice Amount
\$36,444.24

EXHIBIT H

TIME ENTRIES ASSOCIATED WITH H. WEAVER				
Date	Timekeeper	Total Hours for Time Entry	Approximate Hours Attributable to Weaver	Narrative
6/23/20	Kirstin Larson	1.20	.60	Conference with P. Eddins regarding case strategy pertaining to newly disclosed creation and publication dates of asserted registrations, expert witness disclosure and discovery; legal research regarding invalidating registrations;
6/24/20	Judy Jennison	.10	.10	Confer regarding timing of Rule 11 motion (.2); confer regarding H. Weaver as potential expert (.1);
6/24/20	Kirstin Larson	3.40	3.40	Telephone conferences with H. Weaver regarding expert testimony and history of Berg cases; conference with J. Hardin regarding same and regarding Weaver expert report; begin preparing Expert Disclosures;
6/25/20	Judy Jennison	.10	.10	Confer with K. Larson and J. Hardin regarding expert report (.1);
6/25/20	Kirstin Larson	4.90	2.50	Review Berg's response to M&F Western's Motion to Compel; conference with J. Jennison regarding same; review materials regarding prior Symons case and H. Weaver testimony; draft outline of expert report of H. Weaver; conference regarding same;
6/25/20	John Hardin	1.20	1.20	Analysis and initial draft of expert disclosures (1.2); telephone conference with client regarding Rule 11 motion (.3);
6/26/20	Tracy Brandon	1.40	1.0	Research rules on partial summary judgment reply and report same to K. Larson; research/prepare Notice of Disclosure for expert witness disclosure and initial disclosures; confer with K. Larson and team regarding same;
6/26/20	Judy Jennison	.60	.60	Review H. Weaver witness statement (.6);
6/26/20	Kirstin Larson	3.50	3.50	Conference with J. Hardin regarding Expert Report of H. Weaver; conferences with H. Weaver regarding same; update report per input from H. Weaver; update exhibits; conference with P. Eddins regarding H. Weaver rate; update Expert Disclosures; conference regarding court submission attesting to service of Expert Disclosures;
6/26/20	John Hardin	1.80	1.80	Review and finalize expert report of H. Weaver (1.8); review Motion for Summary Judgment Response (.9);
6/29/20	Tracy Brandon	1.50	1.40	Review outstanding USDC deadlines and submit portfolio updates to team; finalize/serve Expert Witness Disclosures; finalize/file Notice of Disclosure; confer with K. Larson

				regarding same; review discovery served and report same to K. Larson;
6/29/20	Kirstin Larson	3.40	.40	Review decision sanctioning Liebowitz in Usherson case; conference regarding same; correspond with P. Eddins regarding Liebowitz sanctions and expert disclosures; update reply in support of Motion to Compel;
9/10/20	Kirstin Larson	2.20	1.10	Assess Berg's Motion to Compel depositions; conference regarding same; correspond with P. Eddins regarding same; conference with H. Weaver regarding depositions; further conference with team regarding same;
10/27/20	Tracy Brandon	1.60	.60	Organize/build deposition prep materials; confer with K. Larson regarding same;
10/27/20	Kirstin Larson	10.00	.30	Legal research in support of Motion for Protective Order and Motion to Obtain Berg's Compliance with Deposition; conference regarding same; telephone conference with counsel regarding Vietnam law and procedures for obtaining deposition through letters rogatory process; begin drafting Motion; conference with P. Eddins regarding deposition preparation; correspond with H. Weaver regarding deposition; conference regarding deposition preparation materials for M&F Western witnesses;
11/2/20	Tracy Brandon	2.40	2.40	Review/organize witness prep materials for H. Weaver/C. Kraft/P. Eddins; confer with K. Larson/P. Eddins regarding same;
11/2/20	Kirstin Larson	7.50	1.0	Conference regarding M&F Western depositions; conference with P. Eddins regarding deposition preparation; conference regarding deposition prep materials for H. Weaver; telephone conference with H. Weaver regarding upcoming deposition and preparation session; conference regarding request for extension of time to file supplemental response to Motion for Summary Judgment; correspond with R. Liebowitz regarding deposition logistics;
11/3/20	Tracy Brandon	4.00	.40	Review document production/prepare index; review witness deposition prep folders; confer with K. Larson regarding same; confer with team regarding logistics for H. Weaver prep binder;
11/3/20	Kirstin Larson	6.90	.30	Conference with C. Kraft regarding deposition preparation; conference with J. LaShelle regarding deposition preparation; telephone conference with P. Eddins regarding deposition preparation; conference regarding response to Berg's request for an extension of time regarding deadline to file supplement regarding summary judgment motion; conference regarding deposition preparation materials for H. Weaver;

11/4/20	Tracy Brandon	.90	.90	Confer with S. Coren regarding H. Weaver deposition materials; confer with K. Larson on upcoming trial schedule and back up;
11/4/20	Judy Jennison	1.0	.10	Review email from K. Larson (.1); strategize about impact of H. Weaver testimony and respond to K. Larson (.1); call with K. Larson and J. Hardin regarding depositions and strategy (.8);
11/4/20	Kirstin Larson	11.20	.50	Conference regarding H. Weaver deposition; defend deposition of P. Eddins; conference regarding same and regarding C. Kraft deposition; telephone conference with C. Kraft regarding deposition preparation; conference regarding upcoming pretrial planning; assess Berg's Response to Motion for an Order to Show Cause;
11/6/20	Tracy Brandon	.10	.10	Confer with team regarding documents for H. Weaver deposition prep;
11/6/20	Kirstin Larson	5.40	.30	Conference regarding H. Weaver deposition and pretrial preparation; defend deposition of J. LaShelle; conference with same regarding same; conference with P. Eddins regarding same;
11/6/20	John Hardin	.50	.50	Work session on pre-trial deadlines (.6); work session on depositions and H. Weaver's position (.5);
11/8/20	Kirstin Larson	.80	.40	Correspond with P. Eddins regarding Berg's response to Motion for an Order to Show Cause; conference regarding H. Weaver deposition and potential withdrawal from case; draft correspondence to R. Liebowitz regarding H. Weaver deposition and G. Ballinger contact;
11/9/20	Judy Jennison	.20	.20	Respond to email from K. Larson about H. Weaver status and email to Liebowitz (.1); revise draft submission and email K. Larson and J. Hardin regarding same (.1);
11/9/20	Kirstin Larson	5.50	5.50	Correspond with R. Liebowitz regarding withdrawal of H. Weaver and production of G. Ballinger contact information; draft Notice to Court regarding withdrawal of H. Weaver; conference regarding same; correspond with P. Eddins regarding same;
11/12/20	Tracy Brandon	.20	.10	Review/edit pretrial action items; review/docket deadlines in order on Motion to Strike Expert Weaver;
11/16/20	Judy Jennison	.10	.10	Review K. Larson draft response to R. Liebowitz (.1); revise draft (.1); revise draft motions in limine (.6); respond to K. Larson summary of meet and confer (.2); read Berg opposition to motion to strike Weaver (.1);

11/17/20	Judy Jennison	.10	.10	Review court order striking Weaver report (.1); review email from K. Larson regarding settlement (.1);
TOTAL TIME ENTRIES ASSOCIATED WITH H. WEAVER				
Timekeeper		Weaver Hours	Fees	
John Hardin		3.50	\$2,940.00	
Judy Jennison		1.30	\$1,150.50	
Kirstin Larson		19.80	\$7,623.00	
Tracy Brandon		6.90	\$1,552.50	
Grand Total Fees			\$13,266.00	
COSTS ASSOCIATED WITH H. WEAVER				
Month	General Description	Itemized Description		Costs
Nov. 2020	UPS mailings and printing costs (to hotel and back)	Photocopies and printing		\$113.40
		UPS - Perkins Coie		\$21.48
		UPS - Hugh Weaver, Rm 204		\$25.13
		UPS - UPS		\$5.99
Grand Total Costs:				\$166.00
TOTAL WEAVER COSTS + FEES			\$13,432.00	

EXHIBIT I

Cost Description	Date	Billed Amount	Invoice	Narrative
Document Delivery Library	12/1/2019	\$0.10	6136729	Courthouse News Service - Document Delivery - 12/2019
Filing fees	1/30/2020	\$100.00	6211069	US Bank - Filing Fees - T. Billable, Application Name: TXED CM ECF, Pay.gov Tracking ID: 26N6S4V2, 01/30/2020
Photocopies and printing	11/20/2020	\$113.40	6305080	Photocopies and printing
Air express charge	11/21/2020	\$5.99	6305080	UPS - UPS
Air express charge	11/21/2020	\$21.48	6305080	UPS - Perkins Coie
Air express charge	11/28/2020	\$49.31	6324153	UPS - WILLIAM M STEGER FEDERAL BUILD
Air express charge	11/28/2020	\$17.00	6324153	UPS - UPS
Air express charge	11/28/2020	\$16.20	6324153	UPS - UPS
Air express charge	11/28/2020	\$16.20	6324153	UPS - UPS
Air express charge	11/28/2020	\$17.33	6324153	UPS - WILLIAM M STEGER FEDERAL BUILD
Air express charge	11/28/2020	\$32.36	6324153	UPS - LIEBOWITZ LAW FIRM, PLLC
Total Costs Sought		\$373.17		

EXHIBIT J

- Emergency Motion to Postpone Mediation to a Meaningful Day (Dkt. 14): *granted* (Dkt. 15)
- Motion to Compel Mandatory Disclosures (Dkt. 26): *granted in pertinent part* (Dkt. 39)
- Buckle MSJ (Dkt. 27): *granted* (Dkt. 37)
- Cross MSJ (Dkt. 41): *granted* (Dkt. 95)
- Motion for Sanctions by M & F Western Products, Inc. (Dkt. 42; Rule 11 Motion): denied *without prejudice* to address arguments in this Motion (Jan. 13, 2021 Oral Order).
- Motion to Strike Plaintiff's Pretrial Disclosures by M & F Western Products, Inc. (Dkt. 57): *Denied as moot in light of Order granting Cross MSJ* (Jan. 13, 2021 Oral Order).
- Motion for Order to Show Cause by M & F Western Products, Inc. (Dkt. 59): denied *without prejudice* to address arguments in this Motion (Jan. 13, 2021 Oral Order).
- Emergency Motion for a Protective Order and Motion Seeking the Court's Guidance Regarding Deposition of Plaintiff (Dkt. 60): *granted in pertinent part*, limiting depositions to three hours and permitting depositions of only three of the seven witnesses Berg sought to depose (Dkt. 64).
- Motion to Strike Plaintiff's Superseding Answers and Plaintiff's Declaration (Dkt. 77): Moot in light of the Court's Order granting the Cross MSJ. (Jan. 13, 2021 Oral Order).